12-09-94

Science Applications International Corporation

An Employee-Owned Company

DCN: RZ3-SAI-R09005-03-IS-00477

RCRA COMPLIANCE EVALUATION INSPECTION REPORT FOR ROLLINS OPC INC. 5756 ALBA STREET LOS ANGELES, CA 90058

DECEMBER 1994

Submitted to:

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 HAWTHORNE STREET
SAN FRANCISCO, CALIFORNIA 94105

Submitted by:

SCIENCE APPLICATIONS INTERNATIONAL CORPORATION
20 CALIFORNIA STREET, SUITE 400
SAN FRANCISCO, CALIFORNIA 94111

EPA CONTRACT NO. 68-W4-0005
EPA WORK ASSIGNMENT NO. R09005
SAIC PROJECT NO. 05-5025-03-8162

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION IX

HAZARDOUS WASTE MANAGEMENT DIVISION
WASTE COMPLIANCE BRANCH

Facility:	Rollins OPC Inc. 5756 Alba Street Los Angeles, CA 90058
EPA ID Number:	CAD050806850
Date of Inspection:	December 9, 1994
Inspectors:	Douglas Baumwoll Science Applications International Corporation 20 California Street, Suite 400 San Francisco, CA 94111 (415) 399-0140
Facility Representatives:	Desmond Phillip, Process Manager Wilfred Ndubuizu, Environmental Affairs Manager Chris Lilley, Technical Manager (213) 585-5063
Report Prepared By:	Douglas Baumwoll
Report Date:	December 23, 1994

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

March 9, 1995

William J. Mitzel
President,
Rollins OPC Inc.
5756 Alba Street
Los Angeles, CA 90058

Re: Certification of Correction of Potential Violation

Dear Mr. Mitzel:

On December 9, 1994, a hazardous waste investigation was conducted by representatives of the United States Environmental Protection Agency (U.S. EPA) at Rollins OPC Inc., 5756 Alba St., Los Angeles, CA, U.S. EPA Identification No. CAT080010101. During the course of this investigation, information was gathered in accordance with Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended [42 U.S.C. 6927]. A copy of the investigation report was forwarded to you on January 12, 1995. The one potential violation listed was for failure to complete a Land Ban Notification form indicating the treatment standards for waste code D001 and its constituents.

Pursuant to Section 3008 of RCRA [42 U.S.C. 6928], U.S. EPA required you to correct the identified area of noncompliance and to submit documentation of its correction to U.S. EPA. Your response, dated February 9, 1995, with the revised Land Ban Notification forms adequately addresses the potential violation.

Therefore, U.S. EPA considers the facility returned to compliance with the regulations cited in the inspection report on February 9, 1995. This letter shall not be construed as a determination by U.S. EPA of your compliance with any other applicable regulations.

Rollins OPC Inc. should continue to take the necessary steps to maintain and ensure compliance with all applicable Federal and State environmental requirements.

Sincerely,

Arlene Kabei, Chief
Compliance Monitoring and
Enforcement Section

cc: Scott Simpson, CA DTSC, Region 3

ROLLINS
ENVIRONMENTAL SERVICES

February 9, 1995

Arlene Kabei, Chief,
Compliance Monitoring and
Enforcement Section
US EPA Region 1X
75 Hawthorne Street,
San Francisco, CA 94105-3901

Dear Ms. Kabei:

RE: HAZARDOUS WASTE INVESTIGATION REPORT- WARNING LETTER
ROLLINS OPC INC. CAD 050 806 850.

This is in response to your warning letter dated January 12, 1995, regarding the result of a hazardous waste investigation at our facility located at 5756 Alba Street, Los Angeles. This investigation was conducted by a representation of the United States Environmental Protection Agency, on December 9, 1994.

Your letter indicated that the said investigation identified a potential violation of the LDR requirements. A consolidated load shipped to Rollins Environmental Services (LA) with manifest number LA A 3304611, had an LDR notification form that did not have the appropriate treatment standard indicated for D001 waste and its constituents.

With regard to the above issue, we have enclosed for your review, a revised LDR notification form, with the appropriate treatment standards indicated for the waste constituents. The designated treatment method for the waste, is by incineration. A known technology capable of destroying the constituents of the waste load. The incineration residue is then stabilized and tested for conformance with the treatment standards before disposal to land. The most stringent standard is applied to the waste constituents. The apparent failure to indicate the halogenated constituents treatment standards on the LDR notification form, in no way compromised the intent or purpose of the LDR notification requirement. I trust that this information will resolve the issue raised by your letter.

If you or your staff have additional questions, please feel free to contact me, or the Facility's Environmental Manager, Wilfred Ndubuizu.

Sincerely,

William J. Mitzel
President

ROLLINS OPC INC.
5756 Alba Street • Los Angeles, California 90058 • FAX: (213) 585-9214 • Phone: (213) 585-5063

LDR NOTIFICATION

ROLLINS ENVIRONMENTAL SERVICES

CUSTOMER INSTRUCTIONS

1. This Land Disposal Restriction (LDR) Notification form applies to EPA RCRA Hazardous Wastes as either a wastewater or non-wastewater (including labpacks not regulated under 40CFR§268.42[c]) or a hazardous debris not meeting relevant LDR treatment standards. Should you have labpacks regulated under §268.42(c) or a waste already meeting the LDR treatment standard, please contact us for the additional or alternate certification form.
2. ***Complete Sections A, B, C and D. Complete Section E only*** when instructed by either Section B below or Section D: EPA Hazardous Waste Code Tables.
3. This form shall be completed in ink or typewritten. Originals can be obtained from all RES offices.

SECTION A. GENERATOR INFORMATION

1. Generator Rollins OPC
2. EPA I.D. No. CAD050806850
3. Manifest No. LAA 3304611
4. RES Waste Stream No. 33229

SECTION B. GENERATOR LDR NOTIFICATION (40 CFR § 268.7)

1. Notifying (Check One): ☐ RES (NJ) ☒ RES (LA) ☐ RES (TX) ☐ OPC ☐ RES of LA ☐ TET
2. Under the above RES Waste Stream No., I am shipping to you a hazardous waste as identified below under Waste Category & California List Notifications:

WASTE CATEGORY & CALIFORNIA LIST NOTIFICATIONS

Check either a, b, or c. ***Waste Category***

☐ a. A wastewater identified by the EPA Waste Code/subcategory that I have checked in Section D; ***OR***

☒ b. A non-wastewater identified by the EPA Waste Code/subcategory that I have checked in Section D; ***OR***

☐ c. A hazardous debris identified by the EPA Waste Code/subcategory that I have checked in Section D. (See EPA Definitions & Subcategory Legend below).

If applicable, check d, e, and f. ***California List Notifications***

☒ d. A D003-D011 waste containing halogenated organic compounds (HOCs) ≥1000 ppm (40 CFR § 268, Appendix III). Additionally, D018-D043 apply if a wastewater.

☐ e. A liquid hazardous waste containing polychlorinated biphenyls (PCBs) ≥50 ppm.

☐ f. A D003-D011 liquid waste containing ≥134 mg/l Nickel and/or ≥130 mg/l Thallium. Additionally, D018-D043 apply if a wastewater.

Note: If any of the above California List Notifications were checked, identify ALL UNDERLYING HAZARDOUS CONSTITUENTS in Section E. which can reasonably be expected to be present in the waste at a concentration above the constituent - specific treatment standard listed in 40 CFR § 268.48.

SECTION C. GENERATOR CERTIFICATION (Authorized Representative)

I hereby certify and warrant that all the information supplied on this form and all associated documents represents a complete and accurate identification of this waste material.

1. Print or Type Name: Stephen Reilly
2. Date: 12 / 02 / 94
3. Signature: Stephen Reilly
4. Title: Shipping & Receiving

EPA DEFINITIONS & SUBCATEGORY LEGEND

AC	=	Acidic (≤2 pH)	HY	=	Hydrated	RS	=	Reactive Sulfide
AK	=	Alkaline (≥12.5 pH)	LB	=	Lead Acid Battery	RX	=	Other Reactives
AN	=	Anhydrous	LM	=	Low Mercury (<260 mg/kg)	TOC	=	Total Organic Carbon
CO	=	Corrosive (>6.35 mm/yr)	LQ	=	Liquid	WR	=	Water Reactive
CB	=	Cadmium Battery	NC	=	Non Calcium Sulfate	WW	=	Wastewater (<1% TOC and <1% Total Suspended Solids)
CS	=	Calcium Sulfate	OX	=	Oxidizer			
HM	=	High Mercury (≥ 260 mg/kg)	RC	=	Reactive Cyanide			

Hazardous Debris = A solid material exceeding a 60 mm particle size (i.e., ≈ 2⅜") that is intended for disposal. The following materials are not debris: cadmium/lead acid batteries, process residuals such as smelter slag and residues from the treatment of waste, wastewater, sludges, or air emission residues; and intact containers of hazardous waste that are not ruptured and that retain at least 75% of their original volume (40 CFR § 268.2[g]).

SECTION D: EPA HAZARDOUS WASTE CODE TABLES

RES Waste Stream No. _____

"D" CHARACTERISTIC CODES

Check All Applicable Waste Codes

☐ D001 GAS	★ ☐ D002 AK	☐ D006	★ ☐ D014	★ ☒ D022	★ ☐ D030	★ ☐ D038
☒ D001 LQ ≥10% TOC	★ ☐ D002 CO	☒ D007	★ ☐ D015	★ ☐ D023	★ ☐ D031	★ ☐ D039
	☐ D003 RX	☐ D008	★ ☐ D016	★ ☐ D024	★ ☐ D032	★ ☐ D040
☐ D001 LQ <10% TOC	☐ D003 RC	☐ D009 LM	★ ☐ D017	★ ☐ D025	★ ☐ D033	★ ☐ D041
	☐ D003 RS	☐ D010	★ ☐ D018	★ ☐ D026	★ ☐ D034	★ ☐ D042
☐ D001 OX	☐ D003 WR	☒ D011	★ ☐ D019	★ ☐ D027	★ ☒ D035	★ ☐ D043
☐ D001 RX	☐ D004	★ ☐ D012	★ ☐ D020	★ ☐ D028	★ ☐ D036	
★ ☐ D002 AC	☒ D005	★ ☐ D013	★ ☐ D021	★ ☐ D029	★ ☐ D037	

★ Check in SECTION E. ALL UNDERLYING HAZARDOUS CONSTITUENTS which can reasonably be expected to be present in this waste at a concentration above the constituent-specific treatment standard listed in 40CFR§268.48.

Note: Following "D" Codes acceptable only for Off-Site, Transfer & Disposal: (Unacceptable for incineration) ☐D006CB ☐D008LB ☐D009HM

"F" LISTED CODES

Check All Applicable Waste Codes

★★ ☐ F001	★★ ☐ F004	☐ F007	☐ F010	☐ F019	☐ F032	☐ F037
★★ ☒ F002	★★ ☒ F005	☐ F008	☐ F011	☐ F024	☐ F034	☐ F038
★★ ☒ F003	☐ F006	☐ F009	☐ F012	☐ F025	☐ F035	★ ☐ F039

★ Check in SECTION E. ALL UNDERLYING HAZARDOUS CONSTITUENTS which can reasonably be expected to be present in this waste at a concentration above the constituent-specific treatment standard listed in 40CFR§268.48.

★★ Check in SECTION E. ALL F001 - F005 HAZARDOUS CONSTITUENTS which can reasonably be expected to be present in this waste at a concentration above the constituent-specific treatment standard listed in 40CFR§268.48. (★★ = F001-F005 constituents in Section E.)

"K" LISTED CODES

Check All Applicable Waste Codes

☐ K001	☐ K017	☐ K033	☐ K049	☐ K086	☐ K104	☐ K124
☐ K002	☐ K018	☐ K034	☐ K050	☐ K087	☐ K105	☐ K125
☐ K003	☐ K019	☐ K035	☐ K051	☐ K088	☐ K106 LM	☐ K126
☐ K004	☐ K020	☐ K036	☐ K052	☐ K090	☐ K107	☐ K131
☐ K005	☐ K021	☐ K037	☐ K060	☐ K091	☐ K108	☐ K132
☐ K006 AN	☐ K022	☐ K038	☐ K061	☐ K093	☐ K109	☐ K136
☐ K006 HY	☐ K023	☐ K039	☐ K062	☐ K094	☐ K110	☐ K141
☐ K007	☐ K024	☐ K040	☐ K064	☐ K095	☐ K111	☐ K142
☐ K008	☐ K025	☐ K041	☐ K065	☐ K096	☐ K112	☐ K143
☐ K009	☐ K026	☐ K042	☐ K066	☐ K097	☐ K113	☐ K144
☐ K010	☐ K027	☐ K043 (NJ only)	☐ K069 CS	☐ K098	☐ K114	☐ K145
☐ K011	☐ K028	☐ K044	☐ K071	☐ K099 (NJ only)	☐ K115	☐ K147
☐ K013	☐ K029	☐ K045	☐ K073	☐ K100	☐ K116	☐ K148
☐ K014	☐ K030	☐ K046	☐ K083	☐ K101	☐ K117	☐ K149
☐ K015	☐ K031	☐ K047	☐ K084	☐ K102	☐ K118	☐ K150
☐ K016	☐ K032	☐ K048	☐ K085	☐ K103	☐ K123	☐ K151

Note: Following "K" Codes Acceptable only for Off-Site Transfer and Disposal (Unacceptable for incineration): ☐ K069NC ☐ K106HM

"P" LISTED CODES

Check All Applicable Waste Codes

☐ P001	☐ P012	☐ P026	☐ P039	☐ P050	☐ P065 LM	☐ P077
☐ P002	☐ P013	☐ P027	☐ P040	☐ P051	☐ P066	☐ P081
☐ P003	☐ P014	☐ P028	☐ P041	☐ P054	☐ P067	☐ P082
☐ P004	☐ P016	☐ P029	☐ P042	☐ P056	☐ P068	☐ P084
☐ P005	☐ P017	☐ P030	☐ P043	☐ P057	☐ P069	☐ P085
☐ P006	☐ P018	☐ P031	☐ P044	☐ P058	☐ P070	☐ P088
☐ P007	☐ P020	☐ P033	☐ P045	☐ P059	☐ P071	☐ P089
☐ P008	☐ P021	☐ P034	☐ P046	☐ P060	☐ P072	☐ P092 LM
☐ P009	☐ P022	☐ P036	☐ P047	☐ P062	☐ P073	☐ P093
☐ P010	☐ P023	☐ P037	☐ P048	☐ P063	☐ P074	☐ P094
☐ P011	☐ P024	☐ P038	☐ P049	☐ P064	☐ P075	☐ P095

SECTION E. UNDERLYING HAZARDOUS CONSTITUENTS

(40 CFR§268.48) *RES Waste Stream No.* _____

INORGANIC CONSTITUENTS

Check all Applicable Constituents

- ☐ Antimony
- ☐ Arsenic
- ☒ **BARIUM**
- ☐ **BERYLLIUM**
- ☐ Cadmium
- ☒ Chromium
- ☐ Cyanides (Total)
- ☐ Cyanides (Amenable)
- ☐ Fluoride
- ☐ Lead
- ☐ Mercury
- ☐ Nickel
- ☐ **SELENIUM**
- ☒ Silver
- ☐ Sulfide
- ☐ **THALLIUM**
- ☐ **VANADIUM**

ORGANIC ACCEPTABLE CONSTITUENTS

Check all Applicable Constituents

- ☐ Acenaphthylene
- ☐ Acenaphthene
- ** ☒ *Acetone*
- ☐ Acetonitrile
- ☐ Acetophenone
- ☐ 2-Acetylaminofluorene
- ☐ Acrolein
- ☐ Acrylamide
- ☐ Acrylonitrile
- ☐ Aldrin
- ☐ 4-Aminobiphenyl
- ☐ Aniline
- ☐ Anthracene
- ☐ Aramite
- ☐ alpha-BHC
- ☐ beta-BHC
- ☐ delta-BHC
- ☐ gamma-BHC
- ** ☐ *Benzene*
- ☐ Benz(a)anthracene
- ☐ Benzal chloride
- ☐ Benzo(b)fluoranthene
- ☐ Benzo(k)fluoranthene
- ☐ Benzo(g,h,i)perylene
- ☐ Benzo(a)pyrene
- ☐ Bromodichloromethane
- ☐ Methyl bromide (Bromomethane)
- ☐ 4-Bromophenyl phenyl ether
- ** ☒ *n-Butyl alcohol*
- ☐ Butyl benzyl phthalate
- ☐ 2-sec-Butyl-4,6-dinitrophenol (Dinoseb)
- ** ☒ ***CARBON DISULFIDE***
- ** ☒ *Carbon tetrachloride*
- ☐ Chlordane(alpha & gamma isomers)
- ☐ p-Chloroaniline
- ** ☒ *Chlorobenzene*
- ☐ Chlorobenzilate
- ☐ 2-Chloro-1,3-butadiene
- ☐ Chlorodibromethane
- ☐ Chloroethane
- ☐ bis(2-Chloroethoxy)methane
- ☐ bis(2-chloroethyl)ether
- ☒ Chloroform
- ☐ bis(2-Chloroisopropyl)ether
- ☐ p-Chloro-m-cresol
- ☐ 2-Chloroethyl vinyl ether
- ☐ Chloromethane (Methyl chloride)
- ☐ 2-Chloronaphthalene
- ☐ 2-Chlorophenol
- ☐ 3-Chloropropylene
- ☐ Chrysene
- ** ☐ *o-Cresol*
- ** ☐ *m-Cresol*
- ** ☐ *p-Cresol*
- ** ☒ ***CYCLOHEXANONE***
- ☐ 1,2-Dibromo-3-chloropropane
- ☐ Ethylene dibromide (1,2-Dibromoethane)
- ☐ Dibromomethane
- ☐ 2,4,D (2-4-Dichlorophenoxyacetic acid)
- ☐ o,p'-DDD
- ☐ p,p'-DDD
- ☐ o,p'-DDE
- ☐ p,p'-DDE
- ☐ o,p'-DDT
- ☐ p,p'-DDT
- ☐ Dibenz(a,h)anthracene
- ☐ Dibenz(a,e)pyrene
- ☐ m-Dichlorobenzene
- ** ☒ *o-Dichlorobenzene*
- ☐ p-Dichlorobenzene
- ☐ Dichlorodifluoromethane
- ☐ 1,1-Dichloroethane
- ☐ 1,2-Dichloroethane
- ☐ 1,1-Dichloroethylene
- ☐ trans,1,2-Dichloroethylene
- ☐ 2,4-Dichlorophenol
- ☐ 2,6-Dichlorophenol
- ☐ 1,2-Dichloropropane
- ☐ cis-1,3-Dichloropropylene
- ☐ trans-1,3-Dichloropropylene
- ☐ Dieldrin
- ☐ Diethyl phthalate
- ☐ 2,4-Dimethyl phenol
- ☐ Dimethyl phthalate
- ☐ Di-n-butyl phthalate
- ☐ 1,4-Dinitrobenzene
- ☐ 4,6-Dinitro-o-cresol
- ☐ 2,4-Dinitrophenol
- ☐ 2,4-Dinitrotoluene
- ☐ 2,6-Dinitrotoluene
- ☐ Di-n-octyl phthalate
- ☐ p-Dimethylaminoazobenzene
- ☐ Di-n-propylnitrosamine
- ☐ 1,4-Dioxane
- ☐ Diphenylamine
- ☐ Diphenylnitrosamine
- ☐ 1,2-Diphenylhydrazine
- ☐ Disulfoton
- ☐ Endosulfan I
- ☐ Endosulfan II
- ☐ Endosulfan sulfate
- ☐ Endrin
- ☐ Endrin aldehyde
- ** ☒ *Ethyl acetate*
- ☐ Ethyl cyanide (Propanenitrile)
- ** ☒ *Ethyl benzene*
- ** ☒ *Ethyl ether*
- ☐ bis(2-Ethylhexyl) phthalate
- ☐ Ethyl methacrylate
- ☐ Ethylene oxide
- ☐ Famphur
- ☐ Fluoranthene
- ☐ Fluorene
- ☐ Heptachlor
- ☐ Heptachlor epoxide
- ☐ Hexachlorobenzene
- ☐ Hexachlorobutadiene
- ☐ Hexachlorocyclopentadiene
- ☐ Hexachloroethane
- ☐ Hexachloropropylene
- ☐ Indeno (1,2,3-c,d) pyrene
- ☐ Iodomethane
- ** ☒ *Isobutyl alcohol*
- ☐ Isodrin
- ☐ Isosafrole
- ☐ Kepone
- ☐ Methacrylonitrile
- ** ☒ ***METHANOL***
- ☐ Methapyrilene
- ☐ Methoxychlor
- ☐ 3-Methylcholanthrene
- ☐ 4,4-Methylene bis (2-chloroaniline)
- ** ☒ *Methylene chloride*
- ** ☒ *Methyl ethyl ketone*
- ** ☒ *Methyl isobutyl ketone*
- ☐ Methyl methacrylate
- ☐ Methyl methansulfonate
- ☐ Methyl parathion
- ☐ Naphthalene
- ☐ 2-Naphthylamine
- ☐ o-Nitroaniline
- ☐ p-Nitroaniline
- ** ☐ *Nitrobenzene*
- ☐ 5-Nitro-o-toluidine
- ☐ o-Nitrophenol
- ☐ p-Nitrophenol
- ☐ N-Nitrosodiethylamine
- ☐ N-Nitrosodimethylamine
- ☐ N-Nitroso-di-n-butylamine
- ☐ N-Nitrosomethylethylamine
- ☐ N-Nitrosomorpholine
- ☐ N-Nitrosopiperidine
- ☐ N-Nitrosopyrrolidine
- ☐ Parathion
- ☐ **TOTAL PCBs**
- ☐ Pentachlorobenzene
- ☐ Pentachloroethane
- ☐ Pentachloronitrobenzene
- ☐ Pentachlorophenol
- ☐ Phenacetin
- ☐ Phenanthrene
- ☐ Phenol
- ☐ Phorate
- ☐ Phthalic acid
- ☐ Phthalic anhydride
- ☐ Pronamide
- ☐ Pyrene
- ** ☒ *Pyridine*
- ☐ Safrole
- ☐ Silvex (2,4,5-TP)
- ☐ 2,4,5-T (2,4,5-Trichloro phenoxy-acetic acid)
- ☐ 1,2,4,5-Tetrachlorobenzene
- ☐ 1,1,1,2-Tetrachloroethane
- ☐ 1,1,2,2-Tetrachloroethane
- ** ☒ *Tetrachloroethylene*
- ☐ 2,3,4,6-Tetrachlorophenol
- ** ☒ *Toluene*
- ☐ Toxaphene
- ☐ Bromoform (Tribromomethane)
- ☐ 1,2,4-Trichlorobenzene
- ** ☒ *1,1,1-Trichloroethane*
- ** ☒ *1,1,2-Trichloroethane*
- ** ☒ *Trichloroethylene*
- ** ☒ *Trichloromonofluoromethane*
- ☐ 2,4,5-Trichlorophenol
- ☐ 2,4,6-Trichlorphenol
- ☐ 1,2,3-Trichloropropane
- ** ☒ *1,1,2-Trichloro-1,2,2,-trifluoro-ethane*
- ☐ **TRIS-(2,3-DIBROMOPROPYL) PHOSPHATE**
- ☐ Vinyl chloride
- ** ☒ *Xylenes-total mixed isomers*

Note: Constituents in bold type have been highlighted for RES purposes only.

SECTION D. (Continued)

RES Waste Stream No. _____

☐ P096	☐ P101	☐ P105	☐ P110	☐ P114	☐ P119	☐ P123
☐ P097	☐ P102	☐ P106	☐ P111	☐ P115	☐ P120	
☐ P098	☐ P103	☐ P108	☐ P112	☐ P116	☐ P121	
☐ P099	☐ P104	☐ P109	☐ P113	☐ P118	☐ P122	

Note: Following "P" Codes Acceptable only for Off-Site Transfer and Disposal: ☐ P015 ☐ P065 HM P076 ☐ P078 ☐ P087 ☐ P092 HM

Check All Applicable Waste Codes

"U" LISTED CODES

Check All Applicable Waste Codes

☐ U001	☐ U037	☐ U075	☐ U112	☐ U148	☐ U184	☐ U223
☐ U002	☐ U038	☐ U076	☐ U113	☐ U149	☐ U185	☐ U225
☐ U003	☐ U039	☐ U077	☐ U114	☐ U150	☐ U186	☐ U226
☐ U004	☐ U041	☐ U078	☐ U115	☐ U151 LM	☐ U187	☐ U227
☐ U005	☐ U042	☐ U079	☐ U116	☐ U152	☐ U188	☐ U228
☐ U006	☐ U043	☐ U080	☐ U117	☐ U153	☐ U189	☐ U234
☐ U007	☐ U044	☐ U081	☐ U118	☒ U154	☐ U190	☐ U235 (NJ only)
☐ U008	☐ U045	☐ U082	☐ U119	☐ U155	☐ U191	☐ U236
☐ U009	☐ U046	☐ U083	☐ U120	☐ U156	☐ U192	☐ U237
☐ U010	☐ U047	☐ U084	☐ U121	☐ U157	☐ U193	☐ U238
☐ U011	☐ U048	☐ U085	☐ U122	☐ U158	☐ U194	☐ U239
☐ U012	☐ U049	☐ U086	☐ U123	☐ U159	☐ U196	☐ U240
☐ U014	☐ U050	☐ U087	☐ U124	☐ U160	☐ U197	☐ U243
☐ U015	☐ U051	☐ U088	☐ U125	☐ U161	☐ U200	☐ U244
☐ U016	☐ U052	☐ U089	☐ U126	☐ U162	☐ U201	☐ U246
☐ U017	☐ U053	☐ U090	☐ U127	☐ U163	☐ U202	☐ U247
☐ U018	☐ U055	☐ U091	☐ U128	☐ U164	☐ U203	☐ U248
☐ U019	☐ U056	☐ U092	☐ U129	☐ U165	☐ U204	☐ U249
☐ U020	☐ U057	☐ U093	☐ U130	☐ U166	☐ U205	☐ U328
☐ U021	☐ U058	☐ U094	☐ U131	☐ U167	☐ U206	☐ U353
☐ U022	☐ U059	☐ U095	☐ U132	☐ U168	☐ U207	☐ U359
☐ U023	☐ U060	☐ U096	☐ U133	☐ U169	☐ U208	
☐ U024	☐ U061	☐ U097	☐ U134	☐ U170	☐ U209	
☐ U025	☐ U062	☐ U098	☐ U135	☐ U171	☐ U210	
☐ U026	☐ U063	☐ U099	☐ U136	☐ U172	☐ U211	
☐ U027	☐ U064	☐ U101	☐ U137	☐ U173	☐ U213	
☐ U028	☐ U066	☐ U102	☐ U138	☐ U174	☐ U214	
☐ U029	☐ U067	☐ U103	☐ U140	☐ U176	☐ U215	
☐ U030	☐ U068	☐ U105	☐ U141	☐ U177	☐ U216	
☐ U031	☐ U069	☐ U106	☐ U142	☐ U178	☐ U217	
☐ U032	☐ U070	☐ U107	☐ U143	☐ U179	☐ U218	
☐ U033	☐ U071	☐ U108	☐ U144	☐ U180	☐ U219	
☐ U034	☐ U072	☐ U109	☐ U145	☐ U181	☐ U220	
☐ U035	☐ U073	☐ U110	☐ U146	☐ U182	☐ U221	
☐ U036	☐ U074	☐ U111	☐ U147	☐ U183	☐ U222	

Note: Following "U" Code Acceptable only for Off-Site Transfer and Disposal (Unacceptable for incineration): ☐ U151 HM

OTHER RES INCINERATION UNACCEPTABLES

Unacceptable EPA Waste Codes (Permit Restricted)

- D003 Explosives
- D002, D004-D011 (High level radioactive wastes from processing of fuel rods).
- The following "F" Listed Dioxin Waste Codes:
  - F020
  - F021
  - F022
  - F023
  - F026
  - F027
  - F028

Unacceptable Hazardous Constituents

The following Dioxins constituents are unacceptable above the LDR treatment standard:

- All HxCDDs
- All HxCDFs
- All PeCDDs
- All PeCDFs
- All TCDDs
- All TCDFs

- Kepone in any concentration is unacceptable at RES (NJ).

Note: Acceptance of the Dioxin constituents in non-listed Dioxin Wastes are on a case-by-case basis.

RCRIS COMPLIANCE FORM - Part 2
(Enforcement Disposition Document - EDD

VIOLATIONS

	Initial	Date
I/CO		3/8/95
Section Chief		3/9/95
TMS entry		
RCRIS entry		
I/CO		

HANDLER DATA *

HANDLER ID: C A D 0 5 0 8 0 6 8 5 0

HANDLER NAME: Rollins OPC, Inc.

LOCATION: [illegible] Alameda St.

CITY/STATE: LA CA ZIP: 90058

California TMS Use

	LDF		Sacramento
	TSF		Berkeley
	GEN		Burbank
	OTH		Long Beach
			Fresno

EVALUATION DATA (All violations indicated below will be linked to this evaluation)

EVALUATION DATE: 1 2 0 9 9 4 (M M D D Y Y)

AGENCY: C E

TYPE: C E I

EVALUATION CONTROL NUMBER: (M M D D Y Y)

VIOLATION DATA *

VIOLATION AREAS (Do not check these. Enter into Violation Area below)

GENERATOR

GGR — General(A)
GLB — Land Ban(268)
GMR — Manifest(B)
GOR — Other(265)
GPT — Pre-Transport(C)
GRR — Record Keeping(D)
GSC — Special Conditions
GSQ — Small Quantity Gen.

TSD REQUIREMENTS

DCH — Chem/Phys/Biol(Q)
DCL — Close/Post Clos(G)
DCP — Contingency(D)
DFR — Financial(H)
DGS — General(B)
DGW — Groundwater(F)
DIN — Incinerator(O)
DPP — Prepare/Prevent(C)
DSI — Surface Impound(K)
DLT — Land Treatment(M)
DMC — Containers(I)
DMR — Manifest(E)
DOR — Other
DPB — Part B Appl.(270)
DLB — Land Ban(268)
DLF — Landfill(N)
DTR — Tank(J)
DTT — Thermal Treat(P)
DWP — Waste Pile(L)

TRANSPORTER

TGR — General
TMR — Manifest
TOR — Other
TWD — Discharge/Spill

OTHER

CAS — Corrective Action Schedule
FEA — Formal Enforcement Action
CSS — Compliance Schedule Violation

Add Change Delete	CONTROL NO.	VIOL. AREA	CLASS	PRIORITY	DATE DETER.*	SCHED. COMP. DATE*	ACTUAL COMP. DATE*
A		D L B	1 2 P	1	12 12 8 1 9 4	/ /	0 2 1 0 9 1 9 5
			1 2 P		/ /	/ /	/ /
Comment:							
			1 2 P		/ /	/ /	/ /
Comment:							
			1 2 P		/ /	/ /	/ /
Comment:							
			1 2 P		/ /	/ /	/ /
Comment:							
			1 2 P		/ /	/ /	/ /
Comment:							

AGENCY: E (E = EPA, S = State)

RESPONSIBLE PERSON: DANIEL (Last Name)

RESPONSIBLE SECTION: H-4-1 (MAIL CODE)

INTRODUCTION

On December 9, 1994, under Contract No. 68-W4-0005 with the U.S. Environmental Protection Agency, Mr. Douglas Baumwoll, representing Science Applications International Corporation (SAIC), conducted an unannounced Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (CEI) at the Rollins OPC (formerly Oil Process Company, or OPC) Inc. facility, which is located at 5756 Alba Street in Los Angeles, California (EPA Identification No. CAD050806850). The facility is currently operating under a U.S. EPA Part B permit, issued July 18, 1990. The purpose of the inspection was to evaluate the facility's compliance with the federal Part B permit and RCRA Hazardous Waste Regulations. The state of California issued a permit to the facility May 29, 1990; the facility was also evaluated under California Hazardous Waste Regulations, as outlined in Title 22, California Code of Regulations (CCR). Photographs were taken to document the inspection and are included as Attachment 1 of this CEI report. Due to problems in film development, approximately two thirds of the negatives do not yield photographs. Hence photographic evidence of the entire inspection does not exist. No violations requiring photographic evidence were discovered. The RCRA CEI checklist for generators is included as Attachment 2. A list of documents referenced in preparation for the inspection and this report can be found in Attachment 3.

In preparation for this CEI, SAIC reviewed the CEI reports generated from the past two inspections (June 6, 1994 and January 11, 1994). In addition, the complete file at the California Department of Toxic Substances Control (DTSC) was reviewed. Documents include current and past state permits, correspondence between Rollins and DTSC regarding the Class II permit modification submitted by Rollins on February 14, 1994, quarterly permit maintenance reports, and the 1991 waste analysis plan.

The CEI was unannounced and was completed within one day. A cyclone fence stops all traffic at the entrance to the facility. A guard greets visitors and incoming shipments, and notifies the office of arrivals. Messrs. Wilfred Ndubuizu, Desmond Phillip, and Chris Lilley were contacted and an in-depth discussion was held to determine the status of the operating units at the facility. Rollins OPC Inc. (Rollins OPC), a wholly owned subsidiary of Rollins Environmental Services, operates a hazardous waste treatment and storage facility here. The Rollins waste management facility receives, stores, blends, treats and transfers select combustible liquid wastes and sludges.

PERMIT STATUS

The original Part A Permit Application for the facility was submitted by Oil Process Company (OPC) to the California Department of Health Services (DHS) on August 6, 1980, and the facility was granted interim status to operate.

On June 3, 1985, OPC was issued a RCRA-equivalent Hazardous Waste Facility Permit (HWFP) by DHS, which expired on June 3, 1990. OPC submitted a revised Part B Permit Application on March 30, 1989. The DHS and EPA issued a revised RCRA HWFP on May 29, 1990, and July 18, 1990, respectively, to allow Oil Process to continue operating a storage, treatment, and transfer facility, to close the existing drum storage/treatment tanks, and to add new tanks, a railcar storage area, and a new drum storage area. The EPA permit became effective on August 27, 1990 and expires on August 27, 1995. Rollins OPC submitted an updated Part A Application on October 14, 1992 to reflect a name change of the facility from Oil Process Company to Rollins OPC Inc. Rollins OPC submitted an updated Part A Application on February 14, 1994 to indicate its intent to handle newly listed RCRA regulated wastestreams. Concurrently, Rollins OPC submitted a Class II permit modification to DTSC to manage the newly listed RCRA wastestreams and to reconfigure its permitted storage units. According to Wilfred Ndubuizu, the public notice and review period has expired, a public meeting was held (March 1994), and Rollins OPC is currently awaiting DTSC's completion of CEQA requirements. Rollins OPC has responded to DTSC's permitting questions relevant to the CEQA document and is aware that once the CEQA document has been published there will be a 30-day waiting period. As of the date of this CEI, DTSC permitting had not completed the CEQA document. There are no interim status units at Rollins OPC.

One element of the Class II permit modification is a decision by Rollins OPC to process household waste aerosol cans. Rollins OPC already processes household waste. Currently, household aerosol cans are directed to a landfill. The approval of the Class II permit modification would allow Rollins OPC to segregate the aerosol cans for incineration thereby minimizing waste destined for landfilling and reducing the impact of aerosol containers on a landfill. The Class II permit modification cover letter and updated Part A Application are included as Attachment 4. The newly listed RCRA wastestreams are identified on page two of the letter. Rollins OPC personnel stated that currently the facility does not accept these waste codes for processing, although some customers have requested that it do so.

Mr. Ndubuizu stated that Rollins OPC submitted a new Part B Permit Application to DTSC on November 21, 1994.

SUMMARY OF PREVIOUS COMPLIANCE EVALUATION INSPECTIONS

Following is a listing of the violations cited in the two most recent CEIs.

On January 11, 1994, EPA conducted a CEI at Rollins OPC. Three potential violations were noted in the inspection report.

66264.173(b) Rollins OPC handled a container in a manner which might cause it to rupture or leak.

66262.34(f)(3) Rollins OPC failed to label containers of HW with the correct composition and physical state of the HW and its hazardous properties.

66264.15(b)(3) Inspection schedule failed to identify appropriate problems to be looked for.

According to the EPA inspection report, Rollins OPC has returned to compliance with these requirements.

On June 6, 1994, SAIC conducted a CEI at Rollins OPC on behalf of EPA. Two potential violations resulted from that inspection.

RCRA Permit, Part III of the permit, General Facility Conditions, Item J. Manifest System Item J. requires that the Permittee shall comply with the manifest requirements of 40 CFR §264.72 Manifest discrepancies.

RCRA Permit, Part III of the permit, General Facility Conditions, Item F. Personnel Training Item F. requires that the Permittee shall conduct personnel training, as required by 40 CFR §264.16.

Rollins OPC personnel stated that pursuant to the June 1994 inspection it has implemented a fundamental change in its training records system. Currently, a spreadsheet is maintained on a database that identifies each employee by name and identifies the training program by title and dates of completion. Attachment 5 is a copy of this tracking spreadsheet. Attachment 6 is a

copy of the cover letter Rollins OPC submitted to EPA on December 6, 1994 in response to an EPA warning letter issued to Rollins OPC on November 4, 1994.

INVESTIGATION

An opening meeting was held in the Rollins OPC main office. Wilfred Ndubuizu, Environmental Affairs Manager; Desmond Phillip, Process Manager; and Chris Lilley, Technical Manager represented Rollins OPC. Operational procedures and the status of new construction were discussed. All three Rollins OPC representatives participated in the site inspection. In addition, Mr. David Gold, Regional Safety, Health, and Environmental Manager for ChemPak Inc., participated in a portion of the facility tour.

Rollins OPC currently operates as a drum storage facility, wastewater treatment facility, and container repackaging facility. In addition, they operate as a transfer facility for ChemPak, Inc., a lab-packaging division of Rollins Environmental Services.

Batch treatment of wastewater consists of oxidation for cyanide wastewater, reduction of hexavalent chrome wastewater, and solidification and neutralization of wastewater containing heavy metals. The eventual disposal mechanism is batch discharge to the sanitary sewer after sampling. Residues generated from the treatment activities (consisting of filter cake and spent activated carbon) are collected in roll-off bins and manifested for disposal offsite.

Several modifications are being implemented to upgrade the Rollins OPC facility. No modifications to the 1990 permit are necessary because the new construction was included in the permit. A current site plan is shown in Attachment 7. Some construction has been completed since the June 1994 inspection; however, no new processes are on-line. The areas referred to in the Special Conditions section (C)(1) of the permit as "container storage area 'B'" and "container storage area 'C'" have not yet been constructed.

Mr. Ndubuizu stated that there were no incidences, releases or catastrophic events since the last inspection that required twenty-four-hour reporting. He stated that the facility is not operating under any corrective action and that it intends to conduct a clean closure when the time comes.

Waste Acceptance

Rollins OPC currently uses Custom Environmental Transport (CET) or Matlack, Inc., both wholly owned subsidiaries of Rollins Environmental Services, for its transportation needs. Prior to offloading, all containers of waste are assigned an internal identification number called the Rollins OPC unique identifier number. This six-digit number allows tracking of individual wastes as they are processed through the facility. The Rollins OPC number assigned to a given drum can be traced to the incoming manifest that reflects shipment of that particular drum into the facility. Upon processing, Rollins OPC may combine multiple drums into a "batch." For instance, Rollins may combine 30 incoming drums into one batch having 15 newly packed drums. Batch numbers, which are encoded with date and piece count information, are written on the newly packed drums.

To confirm that incoming waste matches the profile supplied to Rollins OPC by the generator, a technician draws a sample from each drum and each tank truck load (5000 gallons/truck). Mr. Lilley stated that 100 percent of incoming solid and liquid wastes are sampled. The onsite laboratory can process samples in two to four hours. Analyses selected are determined by knowledge of the generator's profile and are generally more comprehensive for tanker truck samples. Analyses routinely performed for tanker trucks are metals, pH, ammonia, cyanide, hydrocarbons, and fuel value (BTU). Tanker truck samples are screened for all Title 22 metals (although the analytical results for all such metals may not be reported). Rollins OPC has the capability to analyze samples in a gas chromatography mass spectrometer, and does so if the verification analysis indicates the need to do so. If an incoming waste stream were to be identified as caustic, but the waste profile stated that it should be acidic, a new waste profile number would be assigned and the generator notified. Mr. Ndubuizu stated that Rollins OPC is operating under the March 1991 waste analysis plan. An amended waste analysis plan was included in the 1994 permit application; however, current operations are not affected by the amended waste analysis plan.

Drums of waste are offloaded in the drum staging area, located to the east of the interim drum storage pad. Waste is offloaded from tanker trucks parked inside the tanker truck containment building, located to the south of the interim storage pad. After sampling results are obtained, tanker truck contents are pumped into Tank V10. Fugitive vapor emissions are collected by the "old" vapor recovery system (see discussion below).

Applicability to Air Emission Standards for Process Vents

The facility has two active systems to collect emissions venting from the water treatment and process areas: the "old" system, a thermal oxidizer system (direct fired "Hirt" system), and the "new" system (hot rock bed). Currently, the wastewater treatment system, including the filter press, is vented to the old system; the new system collects emissions from the new storage building. Eventually, all process areas will be connected to the new system. Rollins OPC considers both systems to be air pollution control systems not process vents. More specifically, Rollins OPC does not consider either system to be associated with distillation, fractionation, thin-film evaporation, solvent extraction or air/steam stripping operations. Consequently, Rollins OPC and, reportedly, EPA (during the CEI conducted on January 11, 1994) do not find the systems subject to the requirements of 265 Subpart AA, Air Emission Standards for Process Vents.

SITE INSPECTION

New Drum Processing Area and Drum Warehouse

We walked out of the office and to the east, past the future truck unloading area. This area was being used to load outgoing, repacked drums (Photo No. 1). The tanker truck shown in the photo had just pulled in and was waiting to move to the tanker truck containment area for sampling. We entered the 16,000 square-foot drum storage and drum processing building. The storage portion of this building is in use, and is limited in the permit to 71,280 gallons (approximately 1,300 fifty-five-gallon drums) at the Special Conditions section (C)(1), paragraph nine. Drums are stored in this building in rows that extend north-south, according to one of four classifications: oxidizer, corrosive, flammable, or poison. A specially designated area, located in the northwest corner of this building, is used for PCB-containing materials. Adequate aisle space was observed, and all hazardous waste labels faced outward for easy inspection. All drums were on pallets, stacked not more than two drums high. No drums were observed to be open or handled in a manner that could cause rupture or leakage, and no leaks were observed. All wastes are tested for compatibility prior to mixing contents. Newly constructed process areas (e.g., the sampling room and the"sting" room, which will bulk liquids into one of three 3,000-gallon "day" tanks, located on the north side of the building) have been completed but are not operational. Rollins OPC personnel stated that no new processes have been employed since the June 1994 inspection.

During the inspection this inspector asked Mr. Lilley where the contents of a repacked drum labeled as batch no. 010-26-33, mercury switches, originated. After the inspection, he produced a document that lists the individual drums (as identified by the Rollins OPC unique number) that comprise the batch. Rollins OPC can input the unique Rollins drum number into its waste tracking system database, which provides the incoming manifest number on which this drum had been shipped, including the generator name and date. The requested batch sheet is included as Attachment 8. Also included in this attachment is an example of the database screens displayed for a search based on manifest number.

Repackaging Operations

The container repackaging operations consist of bulking incoming wastes into homogenous waste streams for offsite disposal at one of the hazardous waste incinerators operated by Rollins Environmental Services in Deer Park, Texas or Baton Rouge, Louisiana. Additionally, incoming drums may be broken down into multiple repacked drums having a smaller volume (e.g., an incoming drum may have too high a BTU value and need to be repacked into containers having a lesser BTU value). Residues remaining from the bulking and repackaging operations consist of empty drums (California regulated hazardous waste). Since 1993, Rollins OPC has been segregating most drums for reconditioning by Ted Levine located in South El Monte, California and Mesa, Arizona. Approximately 25 percent of the drums cannot be recycled. They are crushed, collected in roll-off bins and disposed of in the landfill at Chemical Waste Management in Kettleman City, California. No crushed drums were in storage in roll-off bins during this inspection.

Drums being repacked were observed in the northwest quadrant of the drum processing building, near the drum crusher. One of the drums was observed to have the smaller of two bungs open. Crumpled paper was visible through the opening. The employees processing these drums were on a break. Mr. Lilley informed this inspector about five minutes later that the drum contained contaminated trash (no liquids). This inspector suggested that a checklist be mounted such that employees would check for items such as open bungs prior to leaving for a break. This inspector judged that the open bung did not constitute the handling of a drum in a manner that could lead to leakage, as the drum contained trash only.

Interim Drum Storage Pad and Drum Staging Area

Drums are segregated by hazard class and stored in one of eight bays at this pad, which is designated as Storage Area "D" at page 13 of the permit (Photo Nos. 2 and 3). Each bay is separated by a 6-inch-high concrete berm. No open drums were observed. Aisle space was adequate, all labels faced outward, and drums observed were not leaking. This inspector noted that signs are posted in Spanish and English here (Photo No. 3), which was not the case for all posted signs within the facility. Mr. Phillip expects to have all signs posted in both English and Spanish within approximately three weeks.

To the east of the interim storage pad is the staging area where drums are currently sampled. Drums are placed in a north-south line and systematically sampled by trained employees (Photo No. 4). Mr. Lilley stated that Rollins OPC does not store a large percentage of incoming waste for long periods of time and that 90% of incoming waste is sampled, processed, and shipped offsite within 24 hours.

Roll-off Bins

Two roll-off bins located in the designated area to the east of the filter press were empty. One roll-off bin was in place under the filter press (Photo No. 5). Desmond Phillip stated that depending on operations, this bin would be full of filter press material in two to three days. No waste carbon filters generated in the polishing tank V5AB were in storage in roll-off bins. Mr. Lilley stated that the carbon adsorption filters in the polishing tank are only changed out a few times each year depending on operations. When changed out, they remain in a roll-off bin on site for no more than seven days.

Water Treatment

According to Desmond Phillip, the existing water treatment system consists of 12 tanks, a filter press, an activated carbon adsorption unit, and a caustic scrubber. Attachment 9 is a system diagram of the wastewater treatment unit. A water layer is maintained in each tank to keep monitoring probes wet. Prior to any treatment, the water in the tank is analyzed by the onsite laboratory. A sample is pulled from the drums of waste and a compatibility test is run. Secondary containment of liquids in the tanks is furnished by a 12-inch-high berm which completely encircles the perimeter of the water treatment plant. Secondary containment for the entire tank process area is 100 percent capacity of the largest tank, tank V9, which has a

capacity of 100,000 gallons. All rainwater that falls inside the plant is collected and pumped to tank V9 for treatment. Tank V9 previously treated oily wastewater; currently, V9 only treats rainwater. Collected rainwater is used as washwater, which is then recollected and run through the treatment process, for ultimate batch disposal to the sewer.

All tanks involved in this system, which primarily treats wastewater generated in the metals plating industry, were inspected for leaks and tank content level monitors. Mr. Phillip stated that all tanks maintain a two-foot freeboard, as per the permit. Special attention was paid to tank V-5, the batch discharge tank. The contents of this tank are sampled once a month by the Los Angeles County Sewer District. Samples are obtained at "end of pipe" or directly from the tank contents. The onsite lab samples each batch prior to discharge. Mr. Phillip stated that the contents of tank V5 do not change during the time required to process analytical samples. In addition, tank V3 was inspected closely. This tank pumps sludge to the filter press. This tank is off-line once a year for an internal inspection. Mr. Phillip stated sludge residue is not generated in this tank, and sludge removal is not required at the time of the internal inspection.

The maximum allowable volume of wastewater treated at Rollins OPC is 380,000 gallons. Mr. Phillip maintains a log of discharge activities in a handwritten ledger. Rollins OPC discharged 7,516 gallons to the Los Angeles sewer system in October 1994. A copy of the ledger for October and the self-monitoring report submitted to the city of Los Angeles is included as Attachment 10.

Treated wastewater is polished in tank V5AB, which generates spent carbon filters that are stored in roll-off bins and hauled offsite for incineration. Effluent from tank V5AB is directed to tank V5, where it is sampled prior to batch disposal to the sewer.

Rollins OPC inspects each tank visually for corrosion and leaks on a daily basis. All fittings, pipes and valves are checked. Observations are recorded in a log. Tank levels are checked by comparison to a gauge with floats. An audio high-level alarm ensures that tanks will not be overfilled. A public address system is in place for facility-wide communication in the event of an emergency.

DOCUMENT REVIEW

Manifests

Rollins OPC submits "Monthly Manifest Receipt Reports" to DTSC. Included in these reports is a summary spreadsheet of waste activity. A copy of the monthly report submitted for waste activity in October 1994 is included in Attachment 11. No violations were noted. Manifest discrepancies or the nonconforming file are overseen by the scheduling and receiving supervisor. Problems remain in this "problems hold" file until the discrepancy is resolved. According to Chris Lilley, discrepancies include loads rejected, piece discrepancies, and 10 percent volume weight discrepancies. Waste analysis discrepancies determined during fingerprint analysis are generally resolved immediately; however, significant waste analysis discrepancies do go to the nonconforming file. Once problems are resolved, paperwork is filed with the manifests. Summaries of the discrepancy are filed in a three-ring binder kept by the scheduling and receiving supervisor.

During the document review a rejected load from September 1994 was identified. Upon request, Rollins OPC produced the monthly report for September waste activity. The cover letter for this report is included as Attachment 12. This letter does state that one load was rejected in September 1994. The majority of the documents in the problems hold file related to piece count discrepancies, which typically are corrected via telephone within 15 days.

Rollins OPC files incoming manifests both alphabetically by the first letter of the customer name and chronologically by month. For example, manifests from the customer "U.S. West" are filed in the "U" folder. The "U" folder labeled October 1994 contains all manifests for this customer, filed chronologically, for the month of October. Manifests generated by customer names beginning with the letters "T" and "U" were reviewed for the months June through December 1994, inclusive. In addition, the "M" folder was reviewed for the month of November 1994. No violations were noted, as all manifests were properly completed by Rollins OPC signing and dating them as the designated facility. Rollins maintains an extra photocopy of its original carbon copies to avoid degradation of the carbon copy over the three-year retention period.

Outgoing manifests for the weeks of July 11 and November 30, 1994 were also reviewed. One issue was noted. The LDR filed with manifest no. LA A 3304611, for waste (D001) shipped from Rollins OPC to Rollins Environmental Services (Louisiana), did not have the treatment standard indicated (marked) appropriately (Attachment 13).

Unmanifested Waste Reports

Rollins OPC had not received any unmanifested waste during the period June 1, 1994 through December 9, 1994.

Financial Responsibility

Mr. Ndubuizu stated that no changes to the financial assurance documentation had occurred since the last inspection. On July 13, 1994, EPA stated that Rollins OPC was in compliance with the applicable requirements (see Attachment 9 of the October 1994 inspection report).

Inspection Logs

Inspection procedures, schedules and logs are maintained by Rollins OPC as required by the facility's permit. Rollins OPC inspection logs were reviewed during the CEI. No violations were observed. This inspector called attention to the fact that not a single problem (e.g., missing label, missing date, leakage, or poor drum condition) was noted on a daily inspection log for the period June to December 1994. Desmond Phillip stated that he is aware that this could indicate a lack of attention to detail by employees completing the forms, and that employees would be reminded not to simply complete the daily log by rote. In addition to the inspection logs, maintenance service requests are completed for routine equipment replacements such as preventive maintenance. These reports are filed by the month, with a summary sheet kept on top of the individual work orders for that month.

Tank Certification

Tank integrity assessments for all existing tanks and new tanks onsite but awaiting installation were conducted by a professional engineer (Don Beattie) in November 1993. EPA reviewed these assessments during the CEI conducted January 11, 1994. According to the EPA's CEI report, the assessments rated all tanks as not leaking and in good condition. The engineer is currently conducting ultrasound testing, which will be completed within two months. Rollins' permit requires annual integrity testing.

Training Records

Upon request, Rollins OPC produced the training records for two employees identified during the facility tour. Mr. J. C. Lewis was observed repacking drums near the drum crusher in the new drum storage building. He was hired on July 18, 1994, and received job-specific training on July 21, 1994. Mr. Jose Flores, observed sampling drums in the staging area, was hired on June 20, 1994. Mr. Flores had a certificate of completion for the OSHA 40-hour training dated October 22, 1993 (prior job training) which expired on October 21, 1994. He works under the supervision of a second employee at all times. Mr. Lilley stated that all employees will receive either initial or annual refresher training during the week of December 19, 1994. Mr. Flores will thus receive training within six months of his hire date, as required by the permit at (M)(2), "personnel training."

Waste Minimization Plan

A copy of the waste minimization plan currently used by the facility is kept onsite. Mr. Ndubuizu stated that no changes have been incorporated since June 1994. The 1994 Part B permit application does contain an amended waste minimization plan.

Review of Documents Required by the Permit

The following list of documents were verified during the review to be on file at the facility as specified by the permit:

- The Emergency Contingency Plan, revised in late 1994 to include new telephone numbers, was reviewed. Six copies exist, including copies at a local medical facility and at local fire and police departments.
- The Waste Analysis Plan dated March 1991. The laboratory QA/QC manual was updated in March 1994.
- The Annual Report for 1993 submitted to EPA February 29, 1994.

POTENTIAL VIOLATION

One potential violation was discovered during the December 9, 1994 CEI.

RCRA Permit, Part II, Section (K)(2)(b)(2) [page 11 of 40]: The LDR notification form submitted to the treatment facility with manifest number LA A 3304611 did not have the appropriate treatment standards indicated for this D001 waste and its constituents.

LIST OF ATTACHMENTS

1. Photograph Log
2. CEI Checklist for Generators
3. List of Reference Documents
4. Updated Part A Application and Class II Permit Modification Cover Letter
5. Current Employee Training Tracking Spreadsheet
6. Portion of Rollins OPC Response Letter, submitted to EPA on December 6, 1994
7. Facility Map
8. Batch Sheet - List of Batched Drums (Identified by Rollins Unique Number)
9. Wastewater Treatment System Flow Diagram
10. Wastewater Discharge Ledger and Discharge Report
11. Monthly Manifest Receipt Report for Activity in October 1994
12. Cover Letter for September Monthly Manifest Receipt Report
13. Manifest no. LA A 3304611, and Incomplete LDR Notification

ATTACHMENT 1

PHOTOGRAPH LOG

Rollins OPC Inc.

Photograph Log and Photographs
Photographer: Douglas Baumwoll
Date: December 9, 1994

Photo No. 1 Future Drum Unloading Area. Drums that were repacked by Rollins OPC are being loaded onto a truck for shipping to a disposal facility. The tanker truck is waiting for processing at the tanker truck containment area to the north.

Photo No. 2 Interim Drum Storage Pad. Drums are segregated by waste type and stored in one of the bays. Good housekeeping was observed in this area.

Photo No. 3 Interim Drum Storage Pad. Southern portion of building shown in Photo No. 2. Signs are posted in Spanish here. Mr. Phillip stated that within three weeks all signs in the facility will be posted in English and Spanish.

Photo No. 4 Drum Staging Area. Recently offloaded drums are being sampled for verification analysis.

Photo No. 5 Filter Press Roll-Off Bin. Filter press material is shown accumulating in a plastic-lined roll-off bin. The door to this area is kept locked.

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Photo No. 3 Interim Drum Storage Pad. Southern portion of building shown in Photo No. 2. Signs are posted in Spanish here. Mr. Phillip stated that within three weeks all signs in the facility will be posted in English and Spanish.

Photo No. 4 Drum Staging Area. Recently offloaded drums are being sampled for verification analysis.

Photo No. 5 Filter Press Roll-Off Bin. Filter press material is shown accumulating in a plastic-lined roll-off bin. The door to this area is kept locked.

ATTACHMENT 2

CEI CHECKLIST FOR GENERATORS

CEI CHECKLIST

INSPECTION DATE: December 9, 1994

SITE ID#: CAD 050 806 850

SITE NAME: Rollins OPC, Inc.

LOCATION: 5756 Alba St.

Los Angeles · CA 90058

City State Zip

LEAD INSPECTOR: Doug Baumwoll

OFFICE: SAIC, San Francisco, CA

****

Facility Representatives: Desmond Phillip, Chris Lilley, Wilfred Ndubuizu

Other Inspectors: none.

Documents Copied or Requested:

Areas Present / Inspected: laboratory, new drum storage and processing building, temp drum storage area (drum staging and sampling), wastewater treatment tanks, Filter press.

Facility Recipient of Report:

Mailing Address (If different):

Generators (Part 261)

	Yes	No	Comments
Does the facility qualify as a conditionally exempt small quantity generator each calendar month by:			
Generating < 100 kgs, & accumulating < 1000 kgs of HW on site? 261.5(a),(g) or	___	X	_____
Generating & accumulating < 1 kg of acute HW, or 100 kgs of acute HW contaminated soil or spill residues? 261.5(e)(1-2)	___	___	_____

If NO, proceed to the next page.

Did the quantity determination include all listed & characteristic wastes generated except: 261.5(d)-			
(1) HW removed from on-site storage?	___	___	_____
(2) HW produced by on-site treatment or reclamation of HW that was already counted once?	___	___	_____
(3) Spent materials that have already been counted once and that are reclaimed and subsequently reused on site? or:	___	___	_____
HW exempted from regulation? 261.5(c)	___	___	_____
Does the facility generate HW?	___	___	_____
Has the generator of solid wastes made a HW determination by determining if the waste is: 262.11			
(a) Excluded from regulation under 261.4?	___	___	_____
(b) Listed as a HW in 261 Subpart D?	___	___	_____
(c) For purposes of compliance with Part 268, or if the waste is not listed in Part 261, Subpart D, has the generator determined if the waste exhibits a characteristic identified in 261 Subpart C by either:			

*** Nonwastewater residues categorical listing added - section (c)(2)(i)(e) - 261.3**

	Yes	No	Comments
(1) Testing the waste?	___	___	_____
(2) Applying knowledge of the hazard characteristic of the waste in light of the materials or the processes used?	___	___	_____
(d) Excluded or restricted under 264, 265, or 268, if determined hazardous?	___	___	_____

NOTE: Disposal of following PCB wastes & materials are exempt from 40 CFR Parts 261-265 & notifications of Section 3010 of RCRA: (261.8)
(1) PCB-containing dielectric fluid & electric equipment containing such fluid authorized for use & regulated under Part 761 of 40 CFR; and that (2) Are HW only because of toxicity characteristics (D018 - D043)

GENERATORS (ALL except Conditionally Exempt)
(Part 262)

	YES	NO	
Has the generator submitted a Notification of Hazardous Waste Activity (EPA Form 8700-12) & obtained an EPA ID # before handling HW? 262.12(a)	X	X	_____
Have they offered HW only to transporters or TSDs with an EPA ID#? 262.12(c)	X	___	_____

HW GENERATION POINTS
The generator may accumulate HW at or near the point of initial generation without meeting storage deadlines provided: 262.34(c)(1)

They have accumulated no more than 55 gallons of HW or 1 quart of acute HW? and:	X	___	Lab has SAA. Drums changed at daily.
The area is under the control of operator of the process generating the waste? and:	X	___	_____
(i) The container is in good condition, compatible with the waste, and kept closed (except when HW is being removed or added)?	X	___	_____
(ii) The container is marked with the words "Hazardous Waste" or other words that identify the contents?	X	___	_____

When HW accumulates in excess of the above amounts, does the generator: 263.34(c)(2)

	Yes	No	Comments
Continue to comply with the storage requirements above? and:	___	___	not applicable.
Mark the container holding the excess with the date the excess amount of HW began accumulating? and:	___	___	
Comply with all 90-day storage requirements within three days? 262.34(a)	___	___	

Generators of Between 100 and 1000 kg/month (Part 262)

	Yes	No	Comments
Does the facility generate between 100 & 1000 kilograms of non-acute* HW per month, & never accumulates more than 6000 kilograms of HW on site?	___	X	

If NO, go to fully regulated generators.

Has the 100-1000 kg/mo. generator accumulated HW on site for no more than 180 days** without a permit or interim status? 262.34(d)	___	___	
Have they accumulated less than 6000 kgs of HW on site at any time? 262.34(d)(1)	___	___	
If the generator exceeded the applicable storage time or quantity limit without an EPA extension, did they comply with all TSD storage facility regulations? 262.34(f)	___	___	
Did the 100-1000 kg/mo. generator that treats, stores, or disposes of HW on-site submit a Part A application by 3/24/87? 270.10(e)(iii)	___	___	

*Generators of more than 1 kg/mo., or who accumulate more than 1 kg at any time, of acute HW (listed in 261.33(e)) are fully-regulated generators. (21.5(f)(2), revised 7/19/88).

**270 days if must transport more than 200 miles to TSD facility. 262.34(e)

ACCUMULATION AREAS & CONTAINERS

	Names of accumulation areas		
	laboratory SAA		
Accumulation if Less than 55 gallons	YES	NO	NOT APPL
The generator may accumulate at or near the point of initial generation up to 55 gals of H.W., or one quart of acutely hazardous waste, provided:			
The containers are marked either with the words "Hazardous Waste" or labels that identify the contents? 262.34(c)(1)(ii)	X		
AND			
The containers are in good condition 265.171.	X		
AND			
The containers are compatible with the waste 265.172.	X		
AND			
The containers are stored closed 265.173(a).	X		
AND			
The containers must not be opened, handled or stored in a manner which may rupture the container or cause it to leak 265.173(b).	X		
Accumulation if greater than 55 gallons			
Are containers visibly marked with:			
The date that the waste accumulation started? 262.34(a)(2)			X
The words "hazardous waste"? 262.34(a)(3)			X
If the generator does not have interim status (as a TSD storage facility), have they accumulated H.W. on-site for less than 90 days? 262.34(a).			X

	Names of accumulation areas		
	YES	NO	NOT APPL.
Does the generator comply with the requirements of 40 CFR Part 265: Subpart I for the use and management of containers listed below. 262.34(a)(1)			
Does the facility transfer H.W. from containers not in good condition or leaking to containers in good condition? 265.171.			
Are containers compatible with the H.W. stored in them? 265.172.			
Are containers stored closed? 265.173(a).			
Are containers managed to prevent rupture or leakage? 265.173(b).			
Are containers inspected weekly for leaks and deterioration? 265.174.			
Are ignitable or reactive wastes stored at least 50 feet from the facility's property line? 265.176.			
Are incompatible wastes stored in separate containers? 265.177(a).			
Is H.W. not placed in unwashed containers that previously held an incompatible waste or material? 265.177(b).			
Are containers holding H.W. that is incompatible with any waste or materials stored nearby in other containers, separated from the incompatibles by sufficient distance or protected by means of a dike, berm, wall, or other device? 265.177(c).			
Does the generator comply with the requirements with 40 CFR Part 265.37: arrangements with local authorities?	See Main checklist		
Does the generator comply with the requirments of 40 CFR Part 265: Subpart D for contingency plan and emergency procedures?	See Main checklist		
Does the generator comply with the requirements of 40 CFR Part 265.16 for personnel training in emergency procedures?	See Main checklist		

	Names of accumulation areas		
Does the generator comply with the requirements of 40 CFR Part 265: Subpart C for Preparedness and Prevention listed below.	YES	NO	NOT APPL
Does the facility have the following equipment where applicable: 265.32-			
(a) Internal communications or alarm system capable of providing immediate emergency instruction?	X		
(b) Telephone or 2-way radios at the scene of operation?	X		
(c) Portable fire extinguishers with water, foam, inert gas, dry chemical: spill control and decontamination equipment?	X		
(d) Water at adequate volume and pressure, or foam producing equipment, or automatic sprinklers, or water spray systems?	X		
Are the systems and equipment listed above tested? 265.33.			not evaluated (1)
Do all personnel have immediate access to the systems and equipment listed in 265.32 (a)-(d)?	X		
Is there adequate aisle space for unobstructed movement of fire, spill control and decontamination equipment in an emergency? 265.35.	X		

(1) Fire extinguishers dated as inspected in November.

Manifests: 262.20-

	Yes	No	Comments
(a) Does the generator prepare a complete manifest according to the instructions (see Part 262 Appendix) before transporting HW off-site?	X		
(b) Does the generator designate on the manifest one facility which is permitted to handle the HW?	X		
(c) Has the facility designated an emergency alternate facility? or:		X	
(d) Instructed the transporter to return the waste to the generator in the event an emergency prevents delivery?	X		

Did the generator use the supplied manifest required by a consignment State: 262.21-

(a) Where the receiving facility is located? or, if not provided by that state:	X		
(b) Where the generating facility is located?		X	not violative
(c) If not provided by either state, the EPA form from another source?		X	" "
Did the manifest consist of enough copies? 262.22	X		
Did the generator: 262.23(a) (1) Sign the manifest by hand?	X		
(2) Obtain the signature of initial transporter and date of acceptance on manifest?	X		
(3) Keep one copy of the manifest (per 262.40(a))?	X		
Did the generator give the remaining copies of the manifest to the transporter? 262.23(b)	X		
If the shipment was sent by water or rail, did the generator send at least 3 copies of the manifest to the designated facilities? 262.23(c), -(d)			not applicable

	Yes	No	Comments
Manifests: Continued-			
For hazardous waste shipments to a facility in an authorized state which is not yet authorized to regulate that waste as hazardous, has the generator: 262.23(e)			
1) Confirmed that the facility receiving the waste agrees to sign and return the manifest to the generator? and;			not applicable
2) Confirmed that any out-of-state transporter signs and forwards the manifest to the designated facility?			"

Pre-Transport Requirements (262 Subpart C)

	Yes	No	Comments
Is waste packaged in accordance with DOT packaging regulations (49 CFR 173, 178-9)? 262.30	X		
Are waste packages labeled in accordance with DOT regulations (40 CFR 172.101)? 262.31	X		
AND 262.32(a) including:			
Proper shipping name [table column 2]?	X		
Proper ID number [table column 3A]?	X		
Proper ORM designation for containers of ORM - A,B,C,D, or E wastes?			not evaluated
Are containers of 110 gallons or less marked with the following words: 262.32(b)			
HAZARDOUS WASTE-Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.			
Generators Name & Address	X		
Manifest Document Number	X		
Does the generator placard or offer the initial transporter the appropriate placards (49 CFR 172 Subpart F)? 262.33			not evaluated

Pre-Transport Requirements: Part 262, Subpart C (continued)

Does the generator document each waste removal as required by the containment building requirements set forth in 262.34(a)?	X	—	

90-Day Storage

If the generator does not have interim status (as TSD storage facility), have they accumulated HW on-site for less than 90 days? 262.34(a)	—	—	~~Not~~ permitted facility
Are containers visibly marked with the date accumulation started? 262.34(a)(2)	X	—	
Is each container or tank clearly marked with the words "Hazardous Waste"? 262.34(a)(3)	X	—	

General Facility Standards (Part 265 Subpart B)

Required Notices:	Yes	No	Comments
Has the RA been notified at least 4 weeks prior to the receipt of HW from a foreign source? 265.12(a) (see also Generators, 262 Subpart F.)	___	___	no foreign shipments since last inspection
Before transferring ownership or operation, has the facility notified the new owners/operators in writing of the requirements of Parts 265 and 270? 265.12(b)	___	___	not evaluated
If a permit has been transferred to a new owner/operator, was the permit modified or revoked and reissued to identify the new permittee? 270.40	___	___	not applicable.

General Waste Analysis:	Yes	No	Comments
Has the facility obtained a detailed chemical and physical analysis that contains all information that must be known to properly treat, store or dispose of each HW or non-hazardous wastes applicable under 265.113(d)? 265.13(a)(1)	X	___	
Does the analysis contain all the information that must be known to treat, store, or dispose of the waste in accordance with part 265.13 & 268 of this chapter? 265.13	X	___	
Did the facility perform the analysis before treating, storing or disposing of any HW or non-hazardous wastes applicable under 265.113(d)? 265.13(a)(1)	X	___	
Does the facility have records documenting the required HW analysis, e.g., lab reports, published data, generator supplied data as developed under Part 261? 265.13(a)(2)	X	___	
Has the analysis been repeated to ensure that it is accurate and up-to-date? 265.13(a)(3)	X	___	

	Yes	No	Comments
After 9/25/90, was the TCLP test used when applicable?			facility evaluates for all Title 22 metals
Is the analysis repeated when there is a change in the generating process? 265.13(a)(3)(i)			not evaluated
For off-site facilities, is the analysis repeated when the HW received does not match the HW designated on the manifest? 265.13(a)(3)(ii)	X		
For off-site facilities, does the facility inspect or analyze each movement of HW to verify that the HW received matches the identity of the HW specified on the manifest? 265.13(a)(4)	X		
Has the facility developed and followed a written waste analysis plan, and is the plan kept at the facility? 265.13(b)	X		
Does the waste analysis plan contain the following elements: 265.13(b)-			
(1) Parameters of analysis of each HW handled and the rationale for the selection of these parameters?	X		
(2) The methods which will be used to test for these parameters, including method 1311 (found in SW-846 or 40 CFR Part 261, Appendix II) if the facility handles Toxicity Characteristic waste(s)? 261.24	X		
(3) Sampling method used to obtain a representative sample of each HW?	X		
(4) Frequency with which the initial analysis will be reviewed or repeated?	X		
(5) For off-site facilities, the analysis that generators have agreed to supply?	X		

	Yes	No	Comments
(6) The methods which will be used to meet the additional analysis requirements for:			
Tanks? (265.198-200)	___	___	waste received by drum (1)
Surface Impoundments? (265.225)	___	___	
Waste Piles? (265.252)	___	___	
Land Treatment? (265.273)	___	___	
Liquids in landfills? (265.314)	___	___	
Incinerators? (265.341)	___	___	
Thermal Treatment? (265.375)	___	___	
Other Treatment? (265.402)	___	___	
Land Disposal Restrictions? (268.7)	___	___	
Complete applicable checklist on each unit.			(1) and tanker truck only.
FOR OFF-SITE FACILITIES, does the plan contain the following elements: 265.13(c)			
(1) Description of procedures used to identify each movement of HW?	X	___	
(2) Description of the sampling method used to obtain a representative sample of the HW?	X	___	
(3) Procedures that the owner/operator receiving containerized hazardous waste will use to determine whether a biodegradeable sorbent is in the waste?	___	___	not evaluated
Is this in compliance with 265.314?	___	___	
Unless exempt under 265.14(a) (physical contact or disturbance of the waste and unit will not cause harm), do security measures include:			
A 24-hour surveillance system? 265.14(b)(1) or:	X	___	
Artificial or natural barriers that completely enclose the facility? 265.14(b)(2)(i) and:	X	___	
Means to control entry onto the active portions of the facility at all times? 265.14(b)(2)(ii)	X	___	

	Yes	No	Comments
Are signs with the legend "Danger-Unauthorized Personnel Keep Out" or equivalent posted that are: 265.14(c)			
At each entrance and any other approach to active portions of the facility?	X		
Legible from at least 25 feet away?	X		
Written in English and any other language predominant in the surrounding area?		X	soon to be in spanish and english. currently, only in English at most locations.
Does the facility inspect for malfunctions, deterioration, operator errors, and HW discharges often enough to correct problems before they cause harm? 265.15(b)(1)	X		
Does the facility follow a written inspection schedule? 265.15(a)	X		
Is the schedule kept at this facility? 265.15(b)(2)	X		
Does the frequency of inspections include items called for in 265.260, 265.270 & 265.304? 265.15(b)(4)			not evaluated
Does the schedule identify types of problems that are expected from malfunction, operator error, deterioration or discharges of all: 265.15(b)(3)-			
Monitoring equipment?			
Safety, emergency equipment?			
Security devices?			
Operating and structural equipment?			
Does the schedule include: 265.15(b)(4)			
The frequency of inspection for each item?	X		daily
Daily inspections for loading and unloading areas?	X		
The inspection frequencies required for each unit?	X		

	Yes	No	Comments
Has the facility taken immediate remedial action to correct hazards revealed on an inspection? 265.15(c)			none identified
Are inspections recorded in an inspection log?	X		
Does the log include: 265.15(d)			
Date and time of inspection?	X		
Name of inspector?	X		
Observations noted?	X		
Date and nature of repairs or other remedial actions?	X		
Are inspection records kept for 3 years? 265.15(d), 265.73(b)(5)	X		
Does the facility have a HW personnel training program? 265.16(a)(1)	X		
Directed by a person trained in HW management procedures? 265.16(a)(2)	X		
Does the program include training in emergency procedures including contingency plan implementation? 265.16(a)(3)- and:	X		
(i) Procedures for using/inspecting, repairing, & replacing emergency & monitoring equipment?	X		
(ii) Key parameters for automatic waste feed cut-off systems?			not evaluated
(iii) Communication or alarm systems?	X		
(iv) Response to fire or explosions?	X		
(v) Response to ground water contamination incidents?			not evaluated
(vi) Emergency shutdown of operations?			not evaluated
Are new personnel supervised until training is completed? 265.16(b)	X		
Do new personnel complete the training within 6 months? 265.16(b)	X		
Is personnel provided annual review of the initial training? 265.16(c)	X		

Do personnel training records include for each HW job: 265.16(d)

	Yes	No	Comments
(1) Job title and name of person filling the position?			not evaluated
(2) Job Description?			
(3) Description of required HW training?			
(4) Documentation that HW training or job experience required has been completed?	X		

Are training records kept for current employees until closure, and past employees for at least 3 years? 265.16(e) X

Requirements for IGNITABLES, REACTIVE, or INCOMPATIBLE WASTES:

Are precautions taken to prevent accidental ignition or reaction, including: 265.17(a)-

Separation and protection from ignition sources?	X		
No smoking signs in hazard areas?	X		

Is the T/S/D of ignitable, reactive or incompatible waste conducted so that it does not: 265.17(b)-

(1) Generate extreme heat or pressure, fire or explosion, or violent reaction?	X		
(2-3) Produce uncontrolled toxic or flammable mists, fumes, dusts or gases?	X		
(4) Damage structural integrity of HW containment devices?	X		
(5) Otherwise threaten human health or the environment?	X		

For each surface impoundment, waste pile, landfill unit required to comply with section 265.221(a), 265.254, & 265.301(a) is there a CQA set up? 265.19 not applicable

Land Disposal Restrictions (Part 268)

	Yes	No	Comments
Did the facility handle any waste restricted from land disposal since its effective prohibition date? 268.1(b)	X		
Exemptions: Are the restricted wastes exempted from land disposal restrictions because:			
Hazardous only by characteristic & disposed into a non-hazardous or hazardous injection well as defined in Part 144.6(a) & do not exhibit any prohibited characteristic of hazardous waste at point of injection? 268.1(c)(3)		X	
An "imminent endangerment" waiver has been granted under 121(d)(4) of CERCLA? 268.1(d)		X	
The waste is from conditionally-exempt small quantity generators? 268.1(e)(1)		X	
A farmer is disposing of waste pesticides in accordance with 262.70? 268.1(e)(2)		X	
EPA has not promulgated land disposal prohibitions or treatment standards for wastes identified or listed as hazardous after November 8, 1984? 268.1(e)(3)		X	
Is a de minimus loss to a wastewater treatment system?			not evaluated

Land Disposal Restrictions (continued)-Part 268

	Yes	No	Comments
Were no restricted wastes handled after the effective dates?	___	X	
Do exemptions apply to all restricted wastes handled?	___	X	

If one of the above = yes, do not respond to remainder of section.

Exceptions: **The following restricted wastes can be land disposed because:**

Facility is granted an exemption pursuant a petition under 268.6? (268.1(2))	___	___	not applicable
Waste was hazardous only because it exhibited a hazardous characteristic?	___	___	
An exemption has been granted because the waste is certified treated by the (BDAT) best demonstrated available technology (268.44(a)	___	___	
A case-by-case extension has been granted under Subpart C or 268.5 for the wastes handled? (268.1(c)(1-4))	___	___	
If any of the preceding 2 exceptions apply, the 268 Subpart C dates and concentrations, Subpart D standards and Subpart E storage restrictions do not apply. Waste analysis and applicable generator certification requirements still pertain.			
Has a treatment standard been established in 268.42 for a particular waste which disqualifies it for dilution? (268.3)	___	___	

Storage:

Are restricted wastes only being stored where: 268.50- (a)(1) A generator is using tanks containers or containment buildings while accumulating a sufficiently large batch to properly recover, treat, or dispose?	X	___	
Is the facility allowed a case-by-case extension because it is a surface impoundment newly regulated due to the additional listings of hazardous wastes & is in compliance with subpart F of 265 & 265.221(a)(c) & (d)? (268.5)	___	X	

Land Disposal Restrictions (Part 268)

Storage: (cont.)	Yes	No	Comments
Are restricted wastes only being stored where: 268.50			
(a)(2) A TSD is accumulating a batch as above? and:			
(i) Each container is marked with the contents and accumulation start date?	X		
(ii) Each tank is marked with the contents, accumulation start date, quantity of HW, and/or the information is in the operating record?	X		
(c) The TSD can prove that any storage over one year was solely for the purpose of necessary accumulation? or:			not applicable - no waste stored over 1 yr observed
(d) The wastes are subject to an approved no-migration petition, case-by-case extension, a nation-wide variance, or an approved (268.6) petition?			
(e) The stored wastes already meet any applicable treatment, concentration, or waiver standards?			
(f) After 7/8/87, are liquid HW over 50 ppm PCBs stored for less than a year, and in a 761.65(b) (TSCA) complying storage area?			PCB storage area delineated and solids storage only.
Generators: Waste Analysis			
If restricted wastes are generated on-site, has the generator, using knowledge or analysis, determined if the waste is restricted from land disposal? 268.7(a)	X		
Was the Paint Filter Liquids Test used to determine if waste sludges and solids were prohibited from land disposal? 268.32(i)			not evaluated

Land Disposal Restrictions (continued) Part 268

	Yes	No	Comments
If waste displays the characteristic of ignitability or of corrosivity and is prohibited, has generator determined what underlying hazardous constituents are present in waste? (368.7(a))	X		
Has generator tested his waste to determine if the waste's PH level restricts it from land disposal? (268.32(j)(i))			not evaluated
Did the generator determine if liquid CA list wastes containing PCBs or HOCs were prohibited? 268.32(j)(2)	X		
Did the generator determine whether a HW listed in 268.10, -.11, -.12, exceeds the applicable treatment standards specified in 268.41, and -.43 by testing a representative sample of the waste extract or the entire waste, or by using knowledge of the waste? 268.35(j)			all incoming waste is tested prior to repacking or processing
Where waste treatment standards are expressed as concentrations in the waste extract (268.41), did any analysis include the TCLP? 268.33(g)			All title 22 metals tested in liquid samples.

NOTICES, CERTIFICATIONS, DEMONSTRATIONS, AND RECORDKEEPING:

If determined that the waste is restricted and requires treatment before land disposal, have they notified the treatment or storage facility with each shipment of waste including: 268.7(a)(1)-			
(A) EPA HW ID number?	X		
(B) Appropriate treatment standards and prohibitions?		X	one manifest & LDR, manifest no. CAA 3304611 (12/2/94) did not have the trtmt stdrd indicated (D001).
(C) Refer to wastewater or non-wastewater category [defined in 268.2(f) or 268.2(d)] & the waste code subdivision? (EX: D003-reactive cyanides)	X		
(D) Manifest number for the waste?	X		

Footnote: Note additional storage requirements for D008 lead materials prior to secondary smelting. (268.356)

Land Disposal Restrictions (continued)- Part 268

	Yes	No	Comments
(E) For hazardous debris, the contaminants subject to treatment and the following statement: "This hazardous debris is subject to the alternative treatment standards of 40 CFR 268.45"			not evaluated - no haz debris observed
(F) Available waste analysis data?	X		
If the waste is restricted but no further treatment is required, has the generator submitted with each shipment to the TSD, a notice and a certification stating it meets both treatment standards & applicable prohibitions? (268.7(a)(2))			All waste evaluated requires Further treatment
Did the notification include: 268.7(a)(2)(i)			
(1) EPA HW ID number?			not applicable
(2) Appropriate treatment standards and prohibitions?			
(3) Refer to wastewater or non-wastewater category [defined in 268.2(f) or 268.2(d)] & the waste code subdivision? (Ex: D003 - Reactive Cyanides)			
(4) Manifest No. for the waste?			
(5) Available waste analysis data?			
If the generator's waste is subject to an exemption from a prohibition on the type of land disposal method utilized for such waste [e.g., a case-by-case extension under 268.5, an exemption under 268.6, or a nationwide variance), have they notified the receiving facility with each shipment of waste that the waste is not prohibited from land disposal? 268.7(a)(3)			

*Is this restricted but no further treatment required waste exempt from notification certification requirements? (268.7(2))

Land Disposal Restrictions (continued)- Part 268

	Yes	No	Comments
Did the notice include: 268.7(a)(3)-			
(A) EPA HW ID number?	___	___	not applicable
(B) Appropriate treatment standards and prohibitions?	___	___	
(C) Refer to wastewater or non-wastewater category [defined in 268.2(f) or 268.2(d)] & the waste code subdivision? (EX: D003 - reactive cyanides)	___	___	
(C) Manifest number for the waste?	___	___	
(D) For hazardous debris, the contaminants subject to treatment and the following statement "This hazardous debris is subject to the alternative treatment standards of 40 CFR 268"	___	___	
(E) Available waste analysis data?	___	___	

If a generator is treating prohibited wastes in tanks, containers, or containment buildings to meet applicable treatment standards, has a waste analysis plan been developed and implemented which:

(a) Is kept on-site in the generator's records? 268.7(a)(4)	X	___	
(b) Is based on chemical and physical analysis of waste(s) being treated & contains all information to treat waste in accordance with standards, including the selected testing frequency? 268.7(a)(4)	X	___	
(c) Was filed with the RA or authorized state a minimum of 30 days prior to treatment? 268.7(a)(4)	X	---	----------
Have wastes shipped off-site complied with notification requirements of 268.7(a)(2)? 268.7(a)(4)	X	___	batch discharged to sanitary sewer after sampling & analyses
If determined that the waste is restricted based solely on knowledge, is all supporting data used in the determination maintained on-site in the generator's files? 268.7(a)(5)	___	___	not appl.
Has the generator retained on-site a copy of all notices, certifications, waste analysis data, and other Part 268 records for at least five years? [268.7(a)(6)]	___	___	~~Not~~, not evaluated

Land Disposal Restrictions (continued) - Part 268

	Yes	No	Comments
Complied with 268.7(a)(5) and (a)(6) and submitted the **appropriate** certification? 268.7(a)(7)	___	___	not appl
If the facility is a small quantity generator with tolling agreements pursuant to 262.20(e), has it complied with notification and certification requirements of 268.7(a) for the initial shipment of waste subject to the agreement? 268.7(a)(9) AND, Retained a copy, on-site, of notification, certification, and tolling agreement, for at least 3 years after expiration of agreement? 268.7(a)(9)	___	___	
Special Rules for Wastes that Exhibit a Characteristic: Did facility retain all records for five years even when characteristic removed before disposal? 268.7(a)(7)	___	___	evaluated records for last 6 months only
Did the initial generator determine all applicable listed & characteristic waste codes (unless the treatment standards for the listed would treat the characteristic)? 268.9(a) & (b)	X	___	
Does the waste display the characteristic of ignitability (D001) or corrosivity (D002)? If YES, has the generator determined what underlying hazardous constituents are reasonably expected to be present in the D001 or D002 waste?	X	___	D001
In addition to any applicable standards determined from the initial point of generation, has the characteristic waste that has been land disposed complied with the treatment standards under Part 268 Subpart D? 268.9(c)	X	___	
Once the waste is no longer hazardous, has a one-time notification and certification been placed in the generators or treater files and sent to the EPA region or authorized state?	___	___	~~not~~ t not evaluated

Land Disposal Restrictions (continued) - Part 268

	Yes	No	Comments
Has the generator filed notification been updated if necessary? (268.9(d))	X		update ~~change~~ due to change of name of owner
Did the notification include the following: 268.9(d)(1)			
(i) Name and address of the Subtitle D facility?			not appl.
(ii) Description of waste as initially generated, including applicable EPA Hazardous Waste Number(s) and treatability groups? 268.9(d)(1)(ii)			
(iii) Applicable treatment standards at initial point of generation?			
Has the certification been signed by an authorized representative and does it state the language in 268.7(b)(5)(i)? 268.9(d)(2)			

Treatment Facilities: Waste Analysis

Has the facility tested their wastes as specified in their waste analysis plan (265.13)? 268.7(b)	X		
Is the identified prohibited waste an exemption allowed to be in a surface impoundment? 268.14		X	
Were non-liquid hazardous wastes containing HOCs in total concentration greater than or equal to 1000 mg/kg & liquid HOC-containing wastes prohibited under 268.32(e)(1) INCINERATED in accordance with the requirements of Part 265, Subpart O?* 268.42(a).(2)			liquids only treated here

*These treatment standards do not apply where the waste is subject to a Part 268, Subpart C treatment standard for specific HOC [such as a hazardous waste chlorinated solvent for which a treatment standard is established under 268.41(a)].

Footnote: Hazardous debris containing radioactive waste is not subject to the treatment standards in table 3 but in 268.45 (268.42)

Land Disposal Restrictions - continued (Part 268)

	Yes	No	Comments
If wastes were not treated in compliance with methods specified in 268.42(a), (c), and (d), has the Administrator approved the use of an alternative treatment method pursuant to 268.42(b)?	___	___	not appl.
Where the treatment standards are expressed as concentrations in the waste extract (268.41), has the facility tested the treatment residues or extract (using the TCLP, 261) to assure they met the applicable treatment standards? 268.7(b)(1)	___	___	not evaluated
Is compliance achieved based upon grab sample data or as otherwise stated in Table CCW?	___	___	
For CA list-only wastes, were the applicable 268.32 Paint Filter Liquids Test, pH test, HOCs, and PCB tests performed? 268.7(b)(2)	___	___	
For wastes with treatment standards expressed as concentrations in the waste (268.43), was the treatment residue, not an extract, tested? 268.7(b)(3)	___	___	

Notifications and certifications:

Has the treater submitted with each shipment to the land disposal facility, a notice including: 268.7(b)(4)			
(i) EPA HW ID number?	___	___	not app
(ii) Appropriate treatment standards, prohibitions, nonwastewater or wastewater category, & applicable subdivision within the waste code (EX: D003-reactive cyanides)?	___	___	
(iii) Manifest no. for the waste?	___	___	
(iv) Available waste analysis data?	___	___	
Is treater exempt from these notification requirements but subject to paragraph (d)?	___	___	

Land Disposal Restrictions- Continued (Part 268)

	Yes	No	Comments
Has the treatment facility submitted a signed certification with each shipment of waste or treatment residue to the land disposal facility stating that the treatment standards in 268 Subpart D were met? 268.7(b)(5)	___	___	
Is treater exempt from these certification requirements but meeting requirements in paragraph (d)?	___	___	
For wastes with treatment standards listed as concentrations (268.41 or -.43) **has the appropriate certification been used?** 268.7(b)(5)(i)	___	___	
For wastes with treatment standards listed as technologies (268.42) **has the appropriate certification been used?** **268.7(b)(5)(ii)**	___	___	
Is the HW a hazardous debris?	___	___	
If so, does the treatment standard address HW levels? (268.40)	___	___	
Is the hazardous debris treated with a specified technology prior to land disposal? (268.45)	___	___	
Does waste display (D001) ignitability and (D003) reactivity characteristics?	___	___	
If YES, have certain deactivation treatment standards been complied with? 268.40	___	___	
For wastes with treatment standards expressed as concentrations in the waste pursuant to 268.43, is compliance with the treatment standards in Part 268, Subpart D, based in part or in whole on the analytical detection limit alternative specified in 268.43(c)? 268.7(b)(5)(iii)	___	___	
If YES, has the appropriate certification been used?	___	___	

Treatment and Off-Site Storage facilities:

Where waste or treatment residues are sent off-site for further management, did the sender comply with the notification and certification requirements as the generator of the waste? 268.7(b)(6-7)	X		send filter cake to TSDF ~~fitting~~ w/ LDR
Treatment in surface impoundments exemption:			
If wastes otherwise prohibited from land disposal are treated in surface impoundments, has the facility met the following conditions: 268.4(a)			
(1) Treated, not just stored, the wastes in the impoundment?			not appl
(2)(i) Analyzed all treatment residues (sludge and supernatant separately) to determine if they meet treatment and/or prohibition standards?			
(2)(ii) Removed, annually, all treatment residues (including liquids) that do not meet treatment or prohibition standards?*			
(2)(iii) Not placed the residues in another impoundment for subsequent management?*			
Has the facility certified that all impoundments used to treat restricted wastes meet design requirements (265.221(a))? 268.4(a)(3-4)			
Has the facility certified that it is in compliance with GW monitoring (265 Subpart F) requirements? 268.4(a)(3-4)			
Is there a principal means of treatment other than evaporation of HW constituents? 268.4(b)			

Footnote: For wastes with characteristics of ignitability (D001) and reactivity (D003) see deactivation treatment standards. (268.40(b))

Does the waste analysis plan include the procedures and schedule for: 268.4(a)(2)(iv); 265.13(b)(7)-	Yes	No	Comments
(i) Sampling the impoundment contents?	___	___	not appl
(ii) The analysis of test data?	___	___	
(iii) The annual removal of residues which exhibit a HW characteristic?	___	___	
and: (A) Fail 268 Subpart D treatment standards? or:	___	___	
(B) Where no treatment standards have been established, such residues are prohibited from land disposal?	___	___	

Land Disposal Facilities *

Except where the owner or operator disposes of any waste that is a recyclable material pursuant to 266.20(b), does the owner or operator of the land disposal facility: 268.7(c)			
Have copies of all notices, certifications, and applicable demonstrations? 268.7(c)(1) (See also 265.73, Operating Record)	___	___	
Tested the waste, or an extract of the waste or treatment residue (using the TCLP, 268 Appendix I) to assure that the wastes or residues are in compliance with land disposal restrictions? 268.7(c)(2)	___	___	
Was the testing performed according to the frequency specified in the waste analysis plan? 268.7(c)(2)	___	___	

*Unless the wastes have a valid "good faith" certification under 268.8. If the annual flow through the impoundments is greater than the combined volume of the impoundments, the supernatant is considered removed.

CERTIFICATION STATEMENTS SUMMARY

Initiator	Recipient	Description	40 CFR Section
Generator	Treatment, Storage, or Disposal Facility	Wastes meeting treatment standards	268.7(a)(2)(ii)
Generator	Treatment or Storage Facility	Appendix IV lab pack wastes (organometallics)	268.7(a)(8)
Generator	Treatment or Storage Facility	Appendix V lab pack wastes (organics)	268.7(a)(9)
Treatment Facility	Land Disposal Facility	Wastes whose treatment standards are listed as concentrations (§268.41)	268.7(b)(5)(i)
Treatment or Storage Facility	Land Disposal Facility	Wastes whose treatment standards are listed as technologies (§268.42)	268.7(b)(5)(ii)
Treatment Facility	Land Disposal Facility	Incinerated wastes (organic detection limit)	268.7(b)(5)(iii)

Land Disposal Restrictions- (continued)- Part 268

Labpack Requirements

	Yes	No	Comments
If a generator is managing a labpack that contains wastes identified in Appendix IV, and wishes to use the alternative treatment standard under 268.42, has the generator, with each shipment of waste, noticed the treatment facility pursuant to 268.7(a)(1)? 268.7(a)(7)	___	___	not appl. - lab pack bulking is covered in permit.
If a generator is managing a labpack that contains organic wastes specified in Part 268, Appendix V, and wishes to use the alternative treatment standards under 268.42, has the generator, with each shipment of waste, noticed the treatment facility pursuant to 268.7(a)(1)? 268.7(a)(8)	___	___	
As an alternative to Subpart D treatment standards, labpacks are eligible for land disposal provided the following requirements are met: 268.42(c)			
Do the labpacks comply with the applicable provisions of 265.316? 268.42(c)(1)	___	___	
Are all hazardous wastes contained in such labpacks specified in Appendix IV or Appendix V to Part 268? 268.42(c)(2)	___	___	
Have labpacks been incinerated in accordance with Part 265, Subpart O? 268.42(c)(3)	___	___	
Have any incinerator residues from labpacks containing D004, D005, D006, D007, D008, D010, and/or D011 been treated in compliance with treatment standards in Part 268, Subpart D? 268.42(c)(4)	___	___	

Land Disposal Restrictions (Part 268)

	Yes	No	Comments
Hazardous Debris (268.7)			
For wastes which are considered hazardous debris excluded from the definition of hazardous waste under 261.3(e), are the following notification and certification requirements being met:			
(1) A one-time notification is submitted to the Director or Authorized State	___	___	not applicable
Does the one-time noticifaction include:			
(i) The name and address of the Subtitle D facility receiving the treated debris?	___	___	
(ii) A description of the hazardous debris as initially generated, including the applicable EPA hazardous waste numbers?	___	___	
(iii) The technology used to treat the debris (for debris excluded under 261.3(e)(1))	___	___	
If the debris was shipped to a different facility or if a different type of debris is treated or a different technology used to treat the debris, has the notification been updated? (286.7(d)(2))	___	___	
Has the treatment facility documented and certified compliance with the treatment standards of Table 1 (268.45) as follows:			
(i) Are records kept of all inspections, evaluations, and analyses of treated debris?	___	___	
(ii) Are records kept of any data or information the treater obtains during treatment of the debris that identifies key operating parameters of the treatment unit?	___	___	
(iii) For each shipment of treated debris, has a certification of compliance been signed by an authorized representative and placed in the facility's files? (including quote requirements?)	___	___	

LDR Effective Dates Banned / Newly Listed Wastes

F037 and F038 generated from surface impoundment cleanouts or closures:
Effective date June 30, 1994

F037 and F038 - mixed with radioactive wastes:
Effective date June 30, 1994

K107 - K112, K117 - K118, K123 - K126, K131 - K132, K136:
Effective date June 30, 1994

U328, U353, U359:
Effective date June 30, 1994

Debris with F037 & F038:
Effective 268.37 - Ignitable (D001) and Corrosive

Following are not in high TOC Ignitable Liquids Subcategory.
Both are managed in systems defined as class U injection wells which don't engage in CWA - equivalent treatment before injection - are prohibited from land disposal.

D001 & D002

---

* Between June 30, 1992 - June 30, 1994
wastes may be diposed of in a landfill only if such unit is in compliance with the requirements specified in 268.5(h)(2), in a surface important if in compliance with 268.5 (h)(2) or 268.14.

EXEMPTIONS:
Have persons been granted an exemption pursuant to a petition? [268.36(h)(2)]
Have persons been granted an extension? [268.36]

ATTACHMENT 3

LIST OF REFERENCE DOCUMENTS

RCRA COMPLIANCE EVALUATION INSPECTION

ROLLINS OPC, INC.

~~June~~ 1994
DECEMBER

The following sets of documents are requested from the above referenced facility to assist S.A.I.C. inspectors in evaluating compliance to RCRA regulations:

1. Manifest sets for waste received for the period ~~December 27, 1993 through June 2, 1994~~ June 1 - December 9, 1994. (including waste acceptance analytical results) - evaluated manifests where OPC = designated facility & generator
2. Daily and Weekly Inspection Reports and Daily Inspection Remedial Work Orders for the period ~~December 27, 1993 through June 2, 1994~~ June 1 December 9, 1994
3. A copy of the current inspection schedule as required by 40 C.F.R. 264.15(b)
4. All unmanifested waste reports for the period June 1 - December 9, 1994 ~~December 27, 1993 through June 2, 1994~~
5. A copy of the facility's current statement of Financial Assurances and Closure Cost Estimates
6. All manifest discrepancies for the period June 1 - December 9, 1994 ~~December 27, 1993 through June 2, 1994~~
7. Tank test data and the most recent tank test inspection report
8. ~~The 1993 Annual Report~~
9. All ~~1993~~ Twenty-four Hour Reporting documents, 6/1/94 - 12/9/94
10. Copies of the training records for the following employees:

~~Jose Aguilar~~ J.C. Lewis
~~Abby Ghanbarzanian~~ Jose Flores

11. The Contingency Plan
12. The Waste Analysis Plan
13. The Waste Minimization Plan

OTHER 14. DTSC File (Glendale, CA)
DX REVISED 15. DTSC HWFP No 90-3-TS-001

~~Hw Supt~~

ATTACHMENT 4

UPDATED PART A APPLICATION AND CLASS II PERMIT MODIFICATION COVER LETTER

ROLLINS
ENVIRONMENTAL SERVICES

Received 2/14/94
Allan Hirsch

February 14, 1994.

Mr. Jeff Zelikson, Director
US EPA Region 9
75 Hawthorne Street,
San Francisco, CA 94105.

Mr. Jose Kou, Branch Chief
Facilities Management Branch
California EPA,
Department of Toxic Substances Control
1011 North Grandview Avenue,
Glendale, CA 91201.

Dear Messrs. Zelikson and Kou:

RE: CLASS TWO PERMIT MODIFICATION

In accordance with 40 CFR 270.42(b) and 22 CCR 66270.42(b), Rollins OPC Inc. hereby requests a Class Two Permit Modification of its hazardous waste permit. This will allow the management of newly listed RCRA waste codes and the reconfiguration of our permitted storage units by delaying or eliminating the construction of certain permitted units, while adding the interim storage unit "D" into the facility permit. The permitted unit summary is enclosed.

This modification will also allow the storage and transhipment of aerosol containers to permitted offsite facilities for incineration.

Management of these waste types at Rollins OPC will not require any changes to our current waste management practices. The facility has handled the same or similar wastes in the past as characteristic D001 and D002 wastes and household hazardous wastes, respectively.

Management of these waste streams will not require a modification of the facility's waste analysis plan (WAP). Sampling and analysis in the WAP are applicable to a wide range of waste types, and are primarily based on the physical and chemical properties of the particular waste and its appropriate disposition.

These changes are requested to provide the needed capacity to manage these newly listed waste streams and to help the generators track the disposal and subsequent destruction of these waste streams. The economic impact is significant in that, through waste consolidation and bulking, the waste generator saves in reduced transportation and disposal cost.

ROLLINS OPC INC.
5756 Alba Street • Los Angeles, California 90058 • FAX: (213) 585-9214 • Phone: (213) 585-5063

Recycling of hazardous waste through this facility will be increased. Waste that is difficult to recycle waste may be pretreated before being shipped offsite for further treatment.

Pursuant to 40 CFR 270.42(b) and 22 CCR 66270.42(b), the permittee must provide the applicable information required by 270.13 through 270.21, 270.62, and 270.63(66270.13 thru 66270.21,66270.66, and 66270.63). All of this information is available in our Part B permit application, with the exception of the required Part A revision (enclosed). None of the other information will change as a result of this permit modification.

Specifically, we request approval to allow Rollins OPC Inc. a hazardous waste management facility located at 5756 Alba street in the City of Los Angeles, to manage waste with the following waste codes: D031, F025, F032, F034, F035, F037, F038, F039, K064, K065, K066, K088, K090, K107, K108, K109, K110, K131, K132, K141, K142, K143, K144, K145, K147, K148, K149, K150, and K151.

We request approval to reconfigure our permitted container storage units, in order to enable the facility to increase its recycling activities, enhance waste segregation on site, and improve waste disposition options.

We request approval to receive, sort, bulk and store aerosol containers pending subsequent shipment off-site for incineration. This will reduce the amount of aerosol containers that would otherwise be landfilled. The environmental benefit is the improved protection of human health and the environment.

Enclosed with this request is the public notice of this permit modification in accordance with the requirement of a Class two permit modification. This announcement will be published in two local news papers in both English and Spanish, and also be sent to all on our mailing list, within seven days of this notification. This will mark the beginning of the 60 day comment period. A copy of the said public notice will be placed at the Florence Avenue, County of Los Angeles Library, 1610 E Florence Avenue,Los Angeles and at Holmes Avenue School, 5108 Holmes Avenue, Los Angeles, California.

include

We believe that the above information meets the requirements for a Class Two Permit Modification. Should there be any questions, please contact me or the Environmental Affairs Manager, Wilfred Ndubuizu at (213) 585-5063.

Sincerely,

William J. Mitzel
President

CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY
DEPARTMENT OF TOXIC SUBSTANCES CONTROL
60-DAY PUBLIC COMMENT PERIOD AND
PUBLIC MEETING FOR HAZARDOUS WASTE FACILITY
PERMIT MODIFICATION REQUEST
ROLLINS OPC INC.(FORMALLY OIL PROCESS COMPANY)
EPA ID NO. CAD 050 806 850
5756 ALBA STREET LOS ANGELES, CALIFORNIA

Rollins OPC Inc. will hold a public meeting on Saturday March 26, 1994. Starting at 10:00 a.m. The meeting will be held at Holmes Avenue School Auditorium, 5108 Holmes Ave., Los Angeles, California 90058; to discuss proposed permit modification and accept public comments on the modification. The public comment period for this request runs from February 21 to April 22, 1994.

On February 14,1994 the Rollins OPC Incorporated requested that its hazardous waste facility permit 90 -3-TS-001 be modified by the California Department of Toxic Substances Control (DTSC) and by the U.S. Environmental Protection Agency (EPA) pursuant to California Health and Safety Code, Ch. 6.5; Title 22, California Code of Regulations, Sections 66270.42-66270.43 and the Resource Conservation and Recovery Act, 42 USC Sec. 6901 et seq., 40 C.F.R. Part 270].

If approved, the permit modification would allow the permittee to manage newly listed federal waste streams, household hazardous waste roundup waste, aerosol cans, mercury and other heavy metals recycling and waste generation minimization through process changes and technological advances at its facility located at 5756 Alba Street, Los Angeles, California 90058. This request will not add any capacity to the facility's current permit, nor have a significant change on how wastes are managed at the facility.

All persons wishing to comment on the proposed modification, may do so in person at the meeting or may do so in writing by April 22,1994 (within 60 days of the date of this notice). Comments and questions should be directed to Andy Bajwa or Tom Mays, California Environmental Protection Agency, Department of Toxic Substances Control 1011 North Grandview Avenue Glendale, California 91201. (818)551-2800. The permittee's compliance history during the life of the permit being modified is also available there.

Copies of the permit modification request and supporting documents are available for public review and copying at DTSC, 1011 North Grandview Avenue Glendale, CA 91201. (818)551-2800 and the County Library 1610 E. Florence Avenue Los Angeles, Ca 90001 (213)581-8028 Thurs: 11 - 5pm. and Sat 12:00 to 5 pm.

The California Environmental Quality Act, require the DTSC to identify any significant environmental impact this proposal may have on the human health or the environment,and provide mitigating measures to make these impacts insignificant. The DTSC will make known its findings in a couple of weeks. The DTSC will make the final decision on the permit modification request, based on its technical review, and the review of all public comments received.

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved OMB No. 2050-0034 Expires 12-31-91
GSA No. 0246-EPA-OT

For EPA Regional Use Only		For State Use Only

Date Received
Month Day Year

EPA

United States Environmental Protection Agency
Washington, DC 20460

Hazardous Waste Permit Application Part A

(Read the Instructions before starting)

I. ID Number(s)

A. EPA ID Number	B. Secondary ID Number *(if applicable)*
C A D 0 5 0 8 0 6 8 5 0	

II. Name of Facility

R O L L I N S O P C I N C

III. Facility Location *(Physical address not P.O. Box or Route Number)*

A. Street

5 7 5 6 A L B A S T R E E T

Street *(continued)*

City or Town	State	ZIP Code
L O S A N G E L E S	C A	9 0 0 5 8 -

County Code *(if known)*	County Name
1 9	L O S A N G E L E S

B. Land Type	C. Geographic Location		D. Facility Existence Date
(enter code)	*LATITUDE (degrees, minutes, & seconds)*	*LONGITUDE (degrees, minutes, & seconds)*	Month Day Year
P	3 3 5 9 2 6 N	1 1 8 1 4 1 5 W	0 6 0 3 1 9 8 5

IV. Facility Mailing Address

Street or P.O. Box

5 7 5 6 A L B A S T R E E T

City or Town	State	ZIP Code
L O S A N G E L E S	C A	9 0 0 5 8 -

V. Facility Contact *(Person to be contacted regarding waste activities at facility)*

Name *(last)*	*(first)*
M I T Z E L	W I L L I A M J .

Job Title	Phone Number *(area code and number)*
P R E S I D E N T	2 1 3 - 5 8 5 - 5 0 6 3

VI. Facility Contact Address *(See instructions)*

A. Contact Address Location	A. Contact Address Mailing	B. Street or P.O. Box
X		

City or Town	State	ZIP Code
		-

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GSA No. 0246-EPA-OT

EPA I.D. Number *(enter from page 1)*: C A D 0 5 0 8 0 6 8 5 0

Secondary ID Number *(enter from page 1)*:

VII. Operator Information *(see instructions)*

Name of Operator: R O L L I N S O P C I N C

Street or P.O. Box: 5 7 5 6 A L B A S T R E E T

City or Town: L O S A N G E L E S

State: C A

ZIP Code: 9 0 0 5 8 -

Phone Number *(area code and number)*: 2 1 3 - 5 8 5 - 5 0 6 3

B. Operator Type: P

C. Change of Operator Indicator: Yes [ ] No [X]

Date Changed Month / Day / Year:

VIII. Facility Owner *(see instructions)*

A. Name of Facility's Legal Owner: R O L L I N S O P C I N C

Street or P.O. Box: 5 7 5 6 A L B A S T R E E T

City or Town: L O S A N G E L E S

State: C A

ZIP Code: 9 0 0 5 8 -

Phone Number *(area code and number)*: 2 1 3 - 5 8 5 - 5 0 6 3

B. Owner Type: P

C. Change of Owner Indicator: Yes [ ] No [X]

Date Changed Month / Day / Year:

IX. SIC Codes *(4-digit, in order of significance)*

Primary		Secondary	
9 5 1 1	(description) Solid waste management		(description)
Secondary		**Secondary**	
	(description)		(description)

X. Other Environmental Permits *(see instructions)*

A. Permit Type *(enter code)*	B. Permit Number	C. Description
R	C A D 0 5 0 8 0 6 8 5 0	RCRA
R	9 0 - 3 - T S - 0 0 1	State Permit
P	2 1 4 9 3 4 2 1 4 9 3 3	Air Pollution prevention equipment
	2 1 4 9 0 9 2 6 8 4 5 9	Permit and Permit To Construct
	2 6 8 4 5 7 2 6 8 4 5 8	
F	W 4 8 5 4 4 6	Industrial Waste Discharge Permit

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved. OMB No. 2050-0034 Expires 12-31-91
GSA No. 0246-EPA-01

EPA I.D. Number (enter from page 1)												Secondary ID Number (enter from page 1)											
C	A	D	0	5	0	8	0	6	8	5	0												

XI. Nature of Business (provide a brief description)

Provide off site treatment, storage and transfer of Hazardous waste, wastewater with Cyanide, Hexavalent Chrome, high and low pH Voc are treated on site and discharged through the City of Los Angeles Bureau of Sanitation Sewerage System. All other Hazardous waste are stored in drums, bulked into tanks and tran-shipped for incineration, further treatment or recycled off site.

XII. Process - Codes and Design Capacities

A. PROCESS CODE - *Enter the code from the list of process codes below that best describes each process to be used at the facility. Twelve lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided in Item XIII.*

B. PROCESS DESIGN CAPACITY - *For each code entered in column A, enter the capacity of the process.*

1. AMOUNT - *Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process unit.*
2. UNIT OF MEASURE - *For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.*

C. PROCESS TOTAL NUMBER OF UNITS - *Enter the total number of units used with the corresponding process code.*

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
	DISPOSAL:	
D79	INJECTION WELL	GALLONS; LITERS; GALLONS PER DAY; OR LITERS PER DAY
D80	LANDFILL	ACRE-FEET OR HECTARE-METER
D81	LAND APPLICATION	ACRES OR HECTARES
D82	OCEAN DISPOSAL	GALLONS PER DAY OR LITERS PER DAY
D83	SURFACE IMPOUNDMENT	GALLONS OR LITERS
	STORAGE:	
S01	CONTAINER (barrel, drum, etc.)	GALLONS OR LITERS
S02	TANK	GALLONS OR LITERS
S03	WASTE PILE	CUBIC YARDS OR CUBIC METERS
S04	SURFACE IMPOUNDMENT	GALLONS OR LITERS
	TREATMENT:	
T01	TANK	GALLONS PER DAY OR LITERS PER DAY
T02	SURFACE IMPOUNDMENT	GALLONS PER DAY OR LITERS PER DAY
T03	INCINERATOR	SHORT TONS PER HOUR; METRIC TONS PER HOUR; GALLONS PER HOUR; LITERS PER HOUR; OR BTU'S PER HOUR
T04	OTHER TREATMENT (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundment or incinerators. Describe the processes in the space provided in Item XIII.)	GALLONS PER DAY; LITERS PER DAY; POUNDS PER HOUR; SHORT TONS PER HOUR; KILOGRAMS PER HOUR; METRIC TONS PER DAY; METRIC TONS PER HOUR; OR SHORT TONS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
GALLONS PER HOUR	E
GALLONS PER DAY	U
LITERS	L
LITERS PER HOUR	H
LITERS PER DAY	V
SHORT TONS PER HOUR	D
METRIC TONS PER HOUR	W
SHORT TONS PER DAY	N
METRIC TONS PER DAY	S
POUNDS PER HOUR	J
KILOGRAMS PER HOUR	R
CUBIC YARDS	Y
CUBIC METERS	C
ACRES	B
ACRE-FEET	A
HECTARES	Q
HECTARE-METER	F
BTU's PER HOUR	K

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GSA No. 0246-EPA-OT

EPA I.D. Number (enter from page 1)	Secondary ID Number (enter from page 1)
C A D 0 5 0 8 0 6 8 5 0	

XII. Process - Codes and Design Capacities (continued)

EXAMPLE FOR COMPLETING ITEM XII (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

Line Number	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	C. PROCESS TOTAL NUMBER OF UNITS	FOR OFFICIAL USE ONLY
X 1	S 0 2	600	G	0 0 2	
X 2	T 0 3	20	E	0 0 1	
1	S 0 1	140,540			
2	S 0 2	600,000			
3	T 0 1	380,500			
4	T 0 4	50,000			
5					
6					
7					
8					
9					
10					
11					
12					

NOTE: If you need to list more than 12 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for additional treatment processes in Item XIII.

XIII. Additional Treatment Processes (follow instructions from Item XII)

Line Number (enter numbers in sequence with Item XII)	A. PROCESS CODE	B. TREATMENT PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. TREATMENT PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	C. PROCESS TOTAL NUMBER OF UNITS	D. DESCRIPTION OF PROCESS
	T 0 4	2,000	U		Lab Pack - Chemical and Physical Treatment
	T 0 4	43,000	U		Bulking, Disolving, Mixing,
	T 0 4	5,000	U		Solidification, Stabilization, Encapsulation
	T 0 4				

EPA I.D. Number (enter from page 1)	Secondary ID Number (enter from page 1)
C A D 0 5 0 8 0 6 8 5 0	

XIV. Description of Hazardous Wastes

A. **EPA HAZARDOUS WASTE NUMBER** - *Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR, Part 261 Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.*

B. **ESTIMATED ANNUAL QUANTITY** - *For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.*

C. **UNIT OF MEASURE** - *For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:*

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in item XII A. on page 3 to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in item XII A. on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that processes that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

1. *Enter the first two as described above.*
2. *Enter "000" in the extreme right box of item XIV-D(1).*
3. *Enter in the space provided on page 7, item XIV-E, the line number and the additional code(s).*

2. PROCESS DESCRIPTION: *If a code is not listed for a process that will be used, describe the process in the space provided on the form (D.(2)).*

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER- Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. *Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.*
2. *In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.*
3. *Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.*

EXAMPLE FOR COMPLETING ITEM XIV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number		A. EPA HAZARD WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESS (1) PROCESS CODES (enter)									D. PROCESS (2) PROCESS DESCRIPTION (If a code is not entered in D(1))
X	1	K	0	5	4	900	P	T	0	3	D	8	0				
X	2	D	0	0	2	400	P	T	0	3	D	8	0				
X	3	D	0	0	1	100	P	T	0	3	D	8	0				
X	4	D	0	0	2												Included With Above

EPA I.D. Number (enter from page 1)	Secondary ID Number (enter from page 1)
C A D 0 5 0 8 0 6 8 5 0	

XIV. Description of Hazardous Waste (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 6.

Line Number	** All line numbers from all pages include these additional process codes. Additional Process Codes (enter)
* *	T 0 1 T 0 4

XV. Map

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.

XVI. Facility Drawing

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

XVII. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

XVIII. Certification(s)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to be the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Owner Signature	Date Signed
W Mitzel	2/14/94
Name and Official Title (type or print): William J. Mitzel, President	
Operator Signature: W Mitzel	Date Signed: 2/14/94
Name and Official Title (type or print): William J. Mitzel, President	

XIX. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (refer to instructions for more information)

ATTACHMENT 5

CURRENT EMPLOYEE TRAINING TRACKING SPREADSHEET

Rollins OPC Employee Training Guideline Rev. 2.0 September 19, 1994

Receiving Rolloff Box Containers	Reaction Safety	Employee Name	Hazardous Waste Labeling	Drum Pumping	Pallet Double Stacking	PPE Disposal	Forklift Safety	High-Risk Areas
		Alonzo, Alma						
		Aluzzi, Richard						
		Alvarez, Celso						
		Alvarez, Humberto						
		Aquino, Jonathon						
		Barron, Elias						
		Bilezikjian, Genie						
		Bills, John			18-Aug-94			
12-Aug-94		Brown, Antonio		19-Aug-94		18-Aug-94	17-Aug-94	
		Esparza, Art						
		Facundo, Roberto						
22-Aug-94	19-Aug-94	Flores, Jose			18-Aug-94			
		Galatis, Ermias	22-Aug-94	19-Aug-94		18-Aug-94	17-Aug-94	16-Aug-94
		Gallegos, Oscar	22-Aug-94	19-Aug-94			17-Aug-94	
12-Aug-94		Gamez, Gabriel	22-Aug-94	19-Aug-94		18-Aug-94	17-Aug-94	16-Aug-94
		Godoy, Miguel	22-Aug-94	19-Aug-94		18-Aug-94	17-Aug-94	16-Aug-94
		Gutierras, Justino						
		Henry, Craig						
12-Aug-94		Hernandez, Gabino	22-Aug-94	19-Aug-94		18-Aug-94	17-Aug-94	16-Aug-94
		Iniguez, Richard						
		Jackson, Lorraine						
		Jones, Mary						
		Kirby, Shirley						
		Lavigne, Gregory	22-Aug-94	19-Aug-94		18-Aug-94	17-Aug-94	16-Aug-94
22-Aug-94	19-Aug-94	Lee, Calvin						
		Lee, Nina						
		Lewis, J.C.	22-Aug-94	19-Aug-94		18-Aug-94	17-Aug-94	16-Aug-94
		Lilley, Chris						
		Lopez, Maria						
12-Aug-94		Maciel, Hector	22-Aug-94	19-Aug-94		18-Aug-94	17-Aug-94	
		Magana, Lupe						
		Mahindru, Al						
		Mahindru, Nancy						
12-Aug-94		Marciel, Marco	22-Aug-94	19-Aug-94		18-Aug-94	17-Aug-94	16-Aug-94
		Medina, Roberto						
		Mitzel, William						
		Ndubuizu, Wilfred						
		Neely, Rodney						
	19-Aug-94	Ocampo, Miguel			18-Aug-94			
		Oney, George						
		Phillip, Desmond						
22-Aug-94	19-Aug-94	Pilarca, Mark			18-Aug-94			
12-Aug-94		Pile, Michael	22-Aug-94	19-Aug-94		18-Aug-94	17-Aug-94	16-Aug-94
12-Aug-94		Pineda, William	22-Aug-94	19-Aug-94		18-Aug-94	17-Aug-94	16-Aug-94
		Pourhassan, Abby		19-Aug-94		18-Aug-94		
		Ramirez, Peter						
12-Aug-94		Reese, Mickey	22-Aug-94	19-Aug-94		18-Aug-94	17-Aug-94	16-Aug-94
		Reilly, Stephen						
		Seeram, Mahallom						
12-Aug-94		Smith, Eric	22-Aug-94	19-Aug-94		18-Aug-94	17-Aug-94	16-Aug-94
22-Aug-94		Sumera, Joe			18-Aug-94			
		Thong, Tiffany						
		Vela, Jesus	22-Aug-94	19-Aug-94		18-Aug-94	17-Aug-94	
	19-Aug-94	Woodard, James			18-Aug-94			
		Young, Gary						

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CHEMPAK Field Train.	Fire Training	Employee Name	Defensive Driver	OJT	Industrial Wastewater Treatment	Wastewater Treatment Operation	Treatment of Metal Wastes	Forklift Safety Operation
		Alonzo, Alma						
		Aluzzi, Richard						
		Alvarez, Celso						
		Alvarez, Humberto						
		Aquino, Jonathon						
		Barron, Elias						
		Bilezikjian, Genie						
		Bills, John						17-Aug-94
		Brown, Antonio						
		Esparza, Art						23-Aug-94
		Facundo, Roberto						
		Flores, Jose						17-Aug-94
		Galatis, Ermias						23-Aug-94
		Gallegos, Oscar						
		Gamez, Gabriel						23-Aug-94
		Godoy, Miguel						
		Gutierras, Justino						
		Henry, Craig						
		Hernandez, Gabino						23-Aug-94
		Iniguez, Richard						
		Jackson, Lorraine						
		Jones, Mary						
		Kirby, Shirley						
		Lavigne, Gregory						23-Aug-94
		Lee, Calvin						17-Aug-94
		Lee, Nina						
		Lewis, J.C.						23-Aug-94
		Lilley, Chris						
		Lopez, Maria						
		Maciel, Hector						23-Aug-94
		Magana, Lupe						
		Mahindru, Al						
		Mahindru, Nancy						
		Marciel, Marco						23-Aug-94
		Medina, Roberto						
		Mitzel, William						
		Ndubuizu, Wilfred						
		Neely, Rodney						
		Ocampo, Miguel						
		Oney, George						
		Phillip, Desmond						
		Pilarca, Mark						
		Pile, Michael						23-Aug-94
		Pineda, William						23-Aug-94
		Pourhassan, Abby						
		Ramirez, Peter						
		Reese, Mickey						23-Aug-94
		Reilly, Stephen						
		Seeram, Mahallom						
		Smith, Eric						23-Aug-94
		Sumera, Joe						17-Aug-94
		Thong, Tiffany						
		Vela, Jesus			15-Jun-94	1-Aug-92	1-Sep-92	23-Aug-94
		Woodard, James						17-Aug-94
		Young, Gary						

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CPR and First Aid	Employee Name	Contingency Plan	E.R.T. Training	Bloodborne Pathogen	Radiation Training	HM-181 Training	Cylinder Training
	Alonzo, Alma	28-Sep-94					
	Aluzzi, Richard						
	Alvarez, Celso	28-Sep-94					
	Alvarez, Humberto	28-Sep-94					
	Aquino, Jonathon						
	Barron, Elias						
	Bilezikjian, Genie						
	Bills, John	28-Sep-94	2-Aug-94				
	Brown, Antonio	28-Sep-94					
	Esparza, Art	28-Sep-94					
	Facundo, Roberto	28-Sep-94					
	Flores, Jose	28-Sep-94	2-Aug-94				
	Galatis, Ermias	28-Sep-94					
	Gallegos, Oscar	28-Sep-94					
	Gamez, Gabriel	28-Sep-94					
	Godoy, Miguel	28-Sep-94					
	Gutierras, Justino	28-Sep-94					
	Henry, Craig						
	Hernandez, Gabino	28-Sep-94					
27-Jan-94	**Iniguez, Richard**						
	Jackson, Lorraine	28-Sep-94					
	Jones, Mary	28-Sep-94					
	Kirby, Shirley						
	Lavigne, Gregory						
	Lee, Calvin						
	Lee, Nina						
	Lewis, J.C.	28-Sep-94					
	Lilley, Chris	28-Sep-94					
	Lopez, Maria	28-Sep-94					
	Maciel, Hector	28-Sep-94					
	Magana, Lupe	28-Sep-94					
	Mahindru, Al						
	Mahindru, Nancy						
	Marciel, Marco	28-Sep-94					
	Medina, Roberto	28-Sep-94					
	Mitzel, William						
	Ndubuizu, Wilfred	28-Sep-94					
	Neely, Rodney						
	Ocampo, Miguel	28-Sep-94	2-Aug-94				
	Oney, George						
9-Mar-90	**Phillip, Desmond**	28-Sep-94					
	Pilarca, Mark	28-Sep-94	2-Aug-94				
	Pile, Michael	28-Sep-94					
	Pineda, William						
	Pourhassan, Abby	28-Sep-94					
	Ramirez, Peter						
	Reese, Mickey	28-Sep-94					
	Reilly, Stephen	28-Sep-94					
	Seeram, Mahallom	28-Sep-94					
	Smith, Eric	28-Sep-94					
	Sumera, Joe	28-Sep-94	2-Aug-94				
	Thong, Tiffany						
	Vela, Jesus	28-Sep-94					
	Woodard, James	28-Sep-94	2-Aug-94				
	Young, Gary	28-Sep-94					

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Most Recent Physical	Employee Name	Requires OSHA Training (Yes/No)	40 Hour OSHA	8 Hour Update	Respirator Fit-Test	Employee Orientation	Forklift Certification
20-Aug-91	**Alonzo, Alma**						
	Aluzzi, Richard						
	Alvarez, Celso						
4-Mar-94	**Alvarez, Humberto**		29-Jun-90	27-Jan-94	27-Jan-94		9-Apr-94
14-Mar-91	**Aquino, Jonathon**		14-Mar-91				
	Barron, Elias						
	Bilezikjian, Genie						
15-Jun-94	**Bills, John**	Yes	24-Jun-94			27-Jun-94	28-Jun-94
7-Jan-94	**Brown, Antonio**		14-Jan-94				9-Apr-94
	Esparza, Art						
14-Mar-94	**Facundo, Roberto**		16-Feb-90	14-Mar-94	14-Mar-94	17-Aug-90	30-Nov-93
13-Jun-94	**Flores, Jose**						
11-Jul-94	**Galatis, Ermias**		21-Jul-94			25-Jul-94	
11-Mar-94	**Gallegos, Oscar**			27-Jan-94	27-Jan-94	17-Aug-90	9-Apr-94
	Gamez, Gabriel						
7-Jan-94	**Godoy, Miguel**		14-Jan-94				9-Apr-94
7-Mar-94	**Gutierras, Justino**		15-Aug-89	27-Jan-94	27-Jan-94		9-Apr-94
8-Nov-93	**Henry, Craig**		8-Nov-93				
24-Feb-94	**Hernandez, Gabino**		29-Jun-90	27-Jan-94	27-Jan-94	17-Aug-94	9-Apr-94
15-Feb-94	**Iniguez, Richard**	Yes	15-Feb-90	27-Jan-94	27-Jan-94		
	Jackson, Lorraine						
	Jones, Mary						
23-Feb-94	**Kirby, Shirley**			23-Feb-94	23-Feb-94	10-Feb-92	27-Jan-94
25-Feb-94	**Lavigne, Gregory**		13-Jun-94	13-Nov-94	13-Nov-94		9-Apr-94
18-Oct-93	**Lee, Calvin**			18-Feb-94	18-Feb-94		9-Apr-94
21-Jan-94	**Lee, Nina**						
6-Jul-94	**Lewis, J.C.**		21-Jul-94			25-Jul-94	
2-May-94	**Lilley, Chris**		4-Aug-89	2-May-94	2-May-94		27-Jan-94
	Lopez, Maria						
28-Feb-94	**Maciel, Hector**		23-Jul-92			20-Jul-92	
11-Apr-94	**Magana, Lupe**		11-Apr-94				
28-Feb-94	**Mahindru, Al**		22-Jun-90	28-Feb-94	28-Feb-94	17-Aug-90	27-Jan-94
22-Feb-94	**Mahindru, Nancy**		22-Feb-91	22-Feb-94	22-Feb-94		27-Jan-94
8-Jul-94	**Marciel, Marco**		22-Jul-94	27-Jan-94	27-Jan-94	25-Jul-94	9-Apr-94
	Medina, Roberto						
	Mitzel, William						
	Ndubuizu, Wilfred					26-Feb-94	1-Dec-93
	Neely, Rodney						
25-Feb-94	**Ocampo, Miguel**						
	Oney, George						
2-Mar-94	**Phillip, Desmond**	Yes	9-Mar-90	2-Mar-94	2-Mar-94		27-Jan-94
31-May-94	**Pilarca, Mark**		24-Jun-94			27-Jun-94	
1-Mar-94	**Pile, Michael**		17-Jan-92	30-Nov-93	30-Nov-93	13-Jul-92	9-Apr-94
	Pineda, William						
8-Mar-94	**Pourhassan, Abby**		4-Aug-89	8-Mar-94	8-Mar-94	31-Jul-89	27-Jan-94
17-Apr-94	**Ramirez, Peter**		22-Feb-91	17-Apr-94	17-Apr-94	29-Apr-91	27-Jan-94
7-Jul-94	**Reese, Mickey**		21-Jul-94			25-Jul-94	
10-Mar-94	**Reilly, Stephen**			10-Mar-94	10-Mar-94		
10-Mar-94	**Seeram, Mahallom**		4-Aug-89	10-Mar-94	10-Mar-94	17-Aug-90	1-Nov-93
	Smith, Eric						9-Apr-94
6-Jan-94	**Sumera, Joe**		14-Jan-94				9-Apr-94
20-Dec-90	**Thong, Tiffany**		20-Dec-90				
1-Nov-90	**Vela, Jesus**		6-Feb-90	26-Jan-94	26-Jan-94		9-Apr-94
	Woodard, James						
	Young, Gary		10-Sep-92	25-Jun-93	25-Jun-93		

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Employee Name	SS#	Position Description	Hire Date	Discharge Date	Requires Annual Physical (Yes/No) (Annual/Bi-Annual)
Alonzo, Alma	548-23-6477	Administrative	26-Aug-91		Bi-Annual
Aluzzi, Richard	562-57-8189	Controller	20-Feb-92		Bi-Annual
Alvarez, Celso	619-12-2880	Operations Technician	27-May-86		Yes
Alvarez, Humberto	578-06-7048	Operations Technician	27-May-86		Yes
Aquino, Jonathon	565-89-2291	Accounting	1-Apr-91		Bi-Annual
Barron, Elias	571-51-7987	Operations Technician	20-Dec-84		Yes
Bilezikjian, Genie	567-80-2395	Administrative	17-Aug-92		Bi-Annual
Bills, John	558-13-6902	Operations Technician	27-Jun-94		
Brown, Antonio	429-39-2531	Operations Technician	10-Jan-94		Yes
Esparza, Art	553-63-5540	Operations Technician	15-Aug-94		Yes
Facundo, Roberto	568-69-2166	Maintenance	30-Jan-89		Yes
Flores, Jose	605-22-5442	Operations Technician	20-Jun-94		Yes
Galatis, Ermias	406-19-1715	Operations Technician	18-Jul-94		
Gallegos, Oscar	571-51-4706	Operations Supervisor	30-Mar-89		Yes
Gamez, Gabriel	615-16-0015	Operations Technician	18-Jul-94		Yes
Godoy, Miguel	503-75-7534	Operations Technician	10-Jan-84		Yes
Gutierras, Justino	568-81-3889	Operations Secretary	7-Jun-86		Yes
Henry, Craig	547-59-4496	Laboratory Technician	2-Dec-93		Yes
Hernandez, Gabino	606-03-0391	Operations Technician	30-Nov-88		Yes
Iniguez, Richard	567-53-0327	Technical Representative	2-Jan-90		Yes
Jackson, Lorraine	571-92-0231	Customer Service			Bi-Annual
Jones, Mary	548-526-6188	Administrative	1-Feb-93		Bi-Annual
Kirby, Shirley	498-38-1441	Laboratory Manager	10-Feb-92		Yes
Lavigne, Gregory	547-33-7181	Operations Technician	4-Jun-92		Yes
Lee, Calvin	441-42-2651	Operations Technician	10-Dec-93		Yes
Lee, Nina	475-92-0405	Laboratory Chemist			Yes
Lewis, J.C.	549-85-0094	Operations Technician	18-Jul-94		
Lilley, Chris	572-31-7921	Technical Manager	1-Sep-87		Yes
Lopez, Maria	465-46-2303	Administrative	31-May-94		Bi-Annual
Maciel, Hector	620-10-1663	Operations Technician	20-Jul-92		Yes
Magana, Lupe	556-33-0444	Operations Supervisor			Yes
Mahindru, Al	564-81-1138	Laboratory Chemist	30-Nov-88		Yes
Mahindru, Nancy	568-85-6990	Laboratory Chemist	18-Mar-91		Yes
Marciel, Marco	551-97-7572	Operations Technician	18-Jul-94		
Medina, Roberto	611-07-4942	Operations Technician			Yes
Mitzel, William	573-29-0195	President			Yes
Ndubuizu, Wilfred	552-47-1265	Environ.Compliance	24-Feb-92		Yes
Neely, Rodney	570-08-8302	Operations Technician	10-Jan-94	13-Jul-94	Yes
Ocampo, Miguel	562-67-1134	Operations Technician	28-Feb-94		Yes
Oney, George	136-56-6639	TSDF Engineer			Yes
Phillip, Desmond	580-12-8950	Operations Manager	20-Jan-86		Yes
Pilarca, Mark	576-98-1752	Operations Technician	27-Jun-94		
Pile, Michael	567-06-4157	Operations Technician	13-Apr-92		Yes
Pineda, William	605-32-9408	Operations Technician	21-Mar-94		Yes
Pourhassan, Abby	557-27-1496	Operations Supervisor	3-Aug-81		Yes
Ramirez, Peter	563-69-3797	Laboratory Technician	18-Feb-91		Yes
Reese, Mickey	168-56-8550	Operations Technician	18-Jul-94		
Reilly, Stephen	560-17-9216	Sched./Rec. Supervisor			Yes
Seeram, Mahallom	082-54-4243	Maintenance	26-Aug-87		Yes
Smith, Eric	546-19-2297	Operations Technician	15-Sep-93		Yes
Sumera, Joe	611-56-3902	Operations Technician	10-Jan-94		Yes
Thong, Tiffany	580-18-6224	Accounting	28-Sep-88		Bi-Annual
Vela, Jesus	525-48-1177	Operations Technician	21-Apr-87		Yes
Woodard, James	377-80-9583	Operations Technician	5-May-93		Yes
Young, Gary	548-79-8735	Operations Supervisor			Yes

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Employee Name	SS#	Position Description	Hire Date	Discharge Date	Requires Annual Physical (Yes/No) (Annual/Bi-Annual)
Alonzo, Alma	548-23-6477	Administrative	26-Aug-91		Bi-Annual
Aluzzi, Richard	562-57-8189	Controller	20-Feb-92		Bi-Annual
Alvarez, Celso	619-12-2880	Operations Technician	27-May-86		Yes
Alvarez, Humberto	578-06-7048	Operations Technician	27-May-86		Yes
Aquino, Jonathon	565-89-2291	Accounting	1-Apr-91		Bi-Annual
Barron, Elias	571-51-7987	Operations Technician	20-Dec-84		Yes
Bilezikjian, Genie	567-80-2395	Administrative	17-Aug-92		Bi-Annual
Bills, John	558-13-6902	Operations Technician	27-Jun-94		
Brown, Antonio	429-39-2531	Operations Technician	10-Jan-94		Yes
Esparza, Art	553-63-5540	Operations Technician	15-Aug-94		Yes
Facundo, Roberto	568-69-2166	Maintenance	30-Jan-89		Yes
Flores, Jose	605-22-5442	Operations Technician	20-Jun-94		Yes
Galatis, Ermias	406-19-1715	Operations Technician	18-Jul-94		
Gallegos, Oscar	571-51-4706	Operations Supervisor	30-Mar-89		Yes
Gamez, Gabriel	615-16-0015	Operations Technician	18-Jul-94		Yes
Godoy, Miguel	503-75-7534	Operations Technician	10-Jan-84		Yes
Gutierras, Justino	568-81-3889	Operations Secretary	7-Jun-86		Yes
Henry, Craig	547-59-4496	Laboratory Technician	2-Dec-93		Yes
Hernandez, Gabino	606-03-0391	Operations Technician	30-Nov-88		Yes
Iniguez, Richard	567-53-0327	Technical Representative	2-Jan-90		Yes
Jackson, Lorraine	571-92-0231	Customer Service			Bi-Annual
Jones, Mary	548-526-6188	Administrative	1-Feb-93		Bi-Annual
Kirby, Shirley	498-38-1441	Laboratory Manager	10-Feb-92		Yes
Lavigne, Gregory	547-33-7181	Operations Technician	4-Jun-92		Yes
Lee, Calvin	441-42-2651	Operations Technician	10-Dec-93		Yes
Lee, Nina	475-92-0405	Laboratory Chemist			Yes
Lewis, J.C.	549-85-0094	Operations Technician	18-Jul-94		
Lilley, Chris	572-31-7921	Technical Manager	1-Sep-87		Yes
Lopez, Maria	465-46-2303	Administrative	31-May-94		Bi-Annual
Maciel, Hector	620-10-1663	Operations Technician	20-Jul-92		Yes
Magana, Lupe	556-33-0444	Operations Supervisor			Yes
Mahindru, Al	564-81-1138	Laboratory Chemist	30-Nov-88		Yes
Mahindru, Nancy	568-85-6990	Laboratory Chemist	18-Mar-91		Yes
Marciel, Marco	551-97-7572	Operations Technician	18-Jul-94		
Medina, Roberto	611-07-4942	Operations Technician			Yes
Mitzel, William	573-29-0195	President			Yes
Ndubuizu, Wilfred	552-47-1265	Environ.Compliance	24-Feb-92		Yes
Neely, Rodney	570-08-8302	Operations Technician	10-Jan-94	13-Jul-94	Yes
Ocampo, Miguel	562-67-1134	Operations Technician	28-Feb-94		Yes
Oney, George	136-56-6639	TSDF Engineer			Yes
Phillip, Desmond	580-12-8950	Operations Manager	20-Jan-86		Yes
Pilarca, Mark	576-98-1752	Operations Technician	27-Jun-94		
Pile, Michael	567-06-4157	Operations Technician	13-Apr-92		Yes
Pineda, William	605-32-9408	Operations Technician	21-Mar-94		Yes
Pourhassan, Abby	557-27-1496	Operations Supervisor	3-Aug-81		Yes
Ramirez, Peter	563-69-3797	Laboratory Technician	18-Feb-91		Yes
Reese, Mickey	168-56-8550	Operations Technician	18-Jul-94		
Reilly, Stephen	560-17-9216	Sched./Rec. Supervisor			Yes
Seeram, Mahallom	082-54-4243	Maintenance	26-Aug-87		Yes
Smith, Eric	546-19-2297	Operations Technician	15-Sep-93		Yes
Sumera, Joe	611-56-3902	Operations Technician	10-Jan-94		Yes
Thong, Tiffany	580-18-6224	Accounting	28-Sep-88		Bi-Annual
Vela, Jesus	525-48-1177	Operations Technician	21-Apr-87		Yes
Woodard, James	377-80-9583	Operations Technician	5-May-93		Yes
Young, Gary	548-79-8735	Operations Supervisor			Yes

Rollins OPC Employee Training Guideline — Rev. 2.0 September 19, 1994

Heat Stress	PVC Gloves	Employee Name	PPE Selection Cleaning	Van Trailer Unloading	Accident Notification	Supplied Air Working	Buddy System Work	Eye-Wash Usage
		Alonzo, Alma						
		Aluzzi, Richard						
		Alvarez, Celso						27-Jul-94
		Alvarez, Humberto						
		Aquino, Jonathon						
		Barron, Elias						
		Bilezikjian, Genie						
11-Aug-94		Bills, John				8-Aug-94	2-Jul-94	27-Jul-94
		Brown, Antonio	10-Aug-94					
		Esparza, Art						
		Facundo, Roberto						
11-Aug-94		Flores, Jose				8-Aug-94	2-Jul-94	27-Jul-94
		Galatis, Ermias	10-Aug-94	9-Aug-94	8-Aug-94		2-Jul-94	
	11-Aug-94	Gallegos, Oscar	10-Aug-94	9-Aug-94				
	11-Aug-94	Gamez, Gabriel	10-Aug-94	9-Aug-94	8-Aug-94		2-Jul-94	
	11-Aug-94	Godoy, Miguel		9-Aug-94	8-Aug-94			
		Gutierras, Justino						
		Henry, Craig						
	11-Aug-94	Hernandez, Gabino	10-Aug-94	9-Aug-94	8-Aug-94			
		Iniguez, Richard						
		Jackson, Lorraine						
		Jones, Mary						
		Kirby, Shirley						
		Lavigne, Gregory		9-Aug-94				
11-Aug-94		Lee, Calvin				8-Aug-94	2-Jul-94	27-Jul-94
		Lee, Nina						
	11-Aug-94	Lewis, J.C.		9-Aug-94	8-Aug-94		2-Jul-94	
		Lilley, Chris						
		Lopez, Maria						
	11-Aug-94	Maciel, Hector		9-Aug-94	8-Aug-94			
		Magana, Lupe						
		Mahindru, Al						
		Mahindru, Nancy						
	11-Aug-94	Marciel, Marco	10-Aug-94	9-Aug-94	8-Aug-94		2-Jul-94	
		Medina, Roberto						
		Mitzel, William						
		Ndubuizu, Wilfred						
		Neely, Rodney						
		Ocampo, Miguel					2-Jul-94	27-Jul-94
		Oney, George						
		Phillip, Desmond						
11-Aug-94		Pilarca, Mark			8-Aug-94		2-Jul-94	
	11-Aug-94	Pile, Michael	10-Aug-94	9-Aug-94	8-Aug-94			
		Pineda, William	10-Aug-94	9-Aug-94	8-Aug-94			
		Pourhassan, Abby	10-Aug-94	9-Aug-94	8-Aug-94			
		Ramirez, Peter						
	11-Aug-94	Reese, Mickey	10-Aug-94	9-Aug-94	8-Aug-94		2-Jul-94	
		Reilly, Stephen						
		Seeram, Mahallom						
	11-Aug-94	Smith, Eric	10-Aug-94	9-Aug-94	8-Aug-94	8-Aug-94		
11-Aug-94		Sumera, Joe					2-Jul-94	27-Jul-94
		Thong, Tiffany						
		Vela, Jesus						
11-Aug-94		Woodard, James				8-Aug-94	2-Jul-94	27-Jul-94
		Young, Gary						

Rollins OPC Employee Training Guideline

Rev. 2.0 September 19, 1994

Pumping Trailers & Drums	Repack Operation	Employee Name	Loading Tankers	Drum Sampling
		Alonzo, Alma		
		Aluzzi, Richard		
		Alvarez, Celso		
		Alvarez, Humberto		
		Aquino, Jonathon		
		Barron, Elias		
		Bilezikjian, Genie		
5-Aug-94		**Bills, John**		
	3-Aug-94	**Brown, Antonio**		27-Jul-94
		Esparza, Art		
		Facundo, Roberto		
5-Aug-94		**Flores, Jose**		
	3-Aug-94	**Galatis, Ermias**		27-Jul-94
	3-Aug-94	**Gallegos, Oscar**	28-Jul-94	27-Jul-94
	3-Aug-94	**Gamez, Gabriel**		27-Jul-94
	3-Aug-94	**Godoy, Miguel**	28-Jul-94	27-Jul-94
		Gutierras, Justino		
		Henry, Craig		
	3-Aug-94	**Hernandez, Gabino**	28-Jul-94	27-Jul-94
		Iniguez, Richard		
		Jackson, Lorraine		
		Jones, Mary		
		Kirby, Shirley		
	3-Aug-94	**Lavigne, Gregory**	28-Jul-94	
5-Aug-94		**Lee, Calvin**		
		Lee, Nina		
	3-Aug-94	**Lewis, J.C.**		27-Jul-94
		Lilley, Chris		
		Lopez, Maria		
		Maciel, Hector		
		Magana, Lupe		
		Mahindru, Al		
		Mahindru, Nancy		
	3-Aug-94	**Marciel, Marco**		27-Jul-94
		Medina, Roberto		
		Mitzel, William		
		Ndubuizu, Wilfred		
		Neely, Rodney		
5-Aug-94		**Ocampo, Miguel**		
		Oney, George		
		Phillip, Desmond		
5-Aug-94		**Pilarca, Mark**		
		Pile, Michael	28-Jul-94	27-Jul-94
		Pineda, William	28-Jul-94	27-Jul-94
	3-Aug-94	**Pourhassan, Abby**		27-Jul-94
		Ramirez, Peter		
	3-Aug-94	**Reese, Mickey**		27-Jul-94
		Reilly, Stephen		
		Seeram, Mahallom		
	3-Aug-94	**Smith, Eric**	28-Jul-94	27-Jul-94
5-Aug-94		**Sumera, Joe**		
		Thong, Tiffany		
	3-Aug-94	**Vela, Jesus**		
		Woodard, James		
		Young, Gary		

ATTACHMENT 6

PORTION OF ROLLINS OPC RESPONSE LETTER, SUBMITTED TO EPA ON DECEMBER 6, 1994

ROLLINS
ENVIRONMENTAL SERVICES

December 6,1994

Diana Bodine, H-4-1
Waste Compliance Branch
U.S. EPA, Region IX
75 Hawthorn Street
San Francisco, CA 94105

Dear Ms. Bodine:

RE: EPA WARNING LETTER DATED NOVEMBER 4, 1994

This is in response to your warning letter dated November 4, 1994, regarding the results of your June 9, 1994, hazardous waste facility investigation. This investigation was conducted by a contractor for the United States Environmental Protection Agency, at our facility located at 5756 Alba Street Los Angeles, CA 90057.

Your letter indicates that the said investigation identified potential violations namely:

1. Failure to have the signed copy of the manifest for a site generated waste filtercake that was shipped off-site, in the operating record; and
2. Lack of documentation of the training received by Jose Aguilar.

In response to the above issue we have enclosed for your review, a response to the items raised in the said letter. We trust that this will satisfy your requirements and return the facility back to compliance.

If you have further questions, please contact me at (213) 585-5063 or you could reach the Environmental Manager, Wilfred Ndubuizu at the same number.

Sincerely

for William J. Mitzel
President

cc: Department of Toxic Substance Control
1101 North Grandview Avenue
Glendale, CA 91201

epa warning

Potential Violation

The following potential violations were discovered during June 9, 1994 CEI. Per your letter.

1. RCRA Permit, Part III of the permit, General Facility Conditions, Item J. Manifest System

Item J. requires that Permittee shall comply with the manifest requirements of 40 CFR Section 264.72. Manifest No. 93130038 was not attached to the manifest filed in the facility's March 1994 manifest file. See attachment 8. Pursuant to Section 264.72, the facility had not submitted to the Regional Administrator a letter describing the discrepancy and attempts to reconcile it, and a copy of the manifest at issue.

Response:

The referenced manifest was for a shipment of wastewater treatment unit filtercake. The shipment, was sent to Chemical Waste Management in Kettleman City, California. At the time of the inspection we had either not received the signed copy of manifest, or it was misfiled. However we have since received a copy of the signed manifest from Chemical Waste Management and it is now on file. A copy is attached for your information.

2. RCRA Permit, Part III of the permit, General Facility Conditions, Item F. Personnel Training.

Item F. Requires that the Permittee shall conduct personnel training, as required by 40 CFR &264.16. Subsection 264.16(d)(3) allows the facility to define the training requirements per position by "a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (d)(1) of this section. " Subsection 264.16(a)(3) requires "at a minimum, the training program must be designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems..." Jose Aguilar has not received emergency/contingency plan/evacuation procedures training since July 27, 1990, and other than Dept 250/260 training, there is no indication that he has received any job position training since that time. The Rollins OPC Operating Procedures Manual states that specific operations training is required for all tasks, such as sampling, waste receiving, repacking, however there was no documentation in the training file of Jose Aguilar that he had received this task-specific training.

Response:

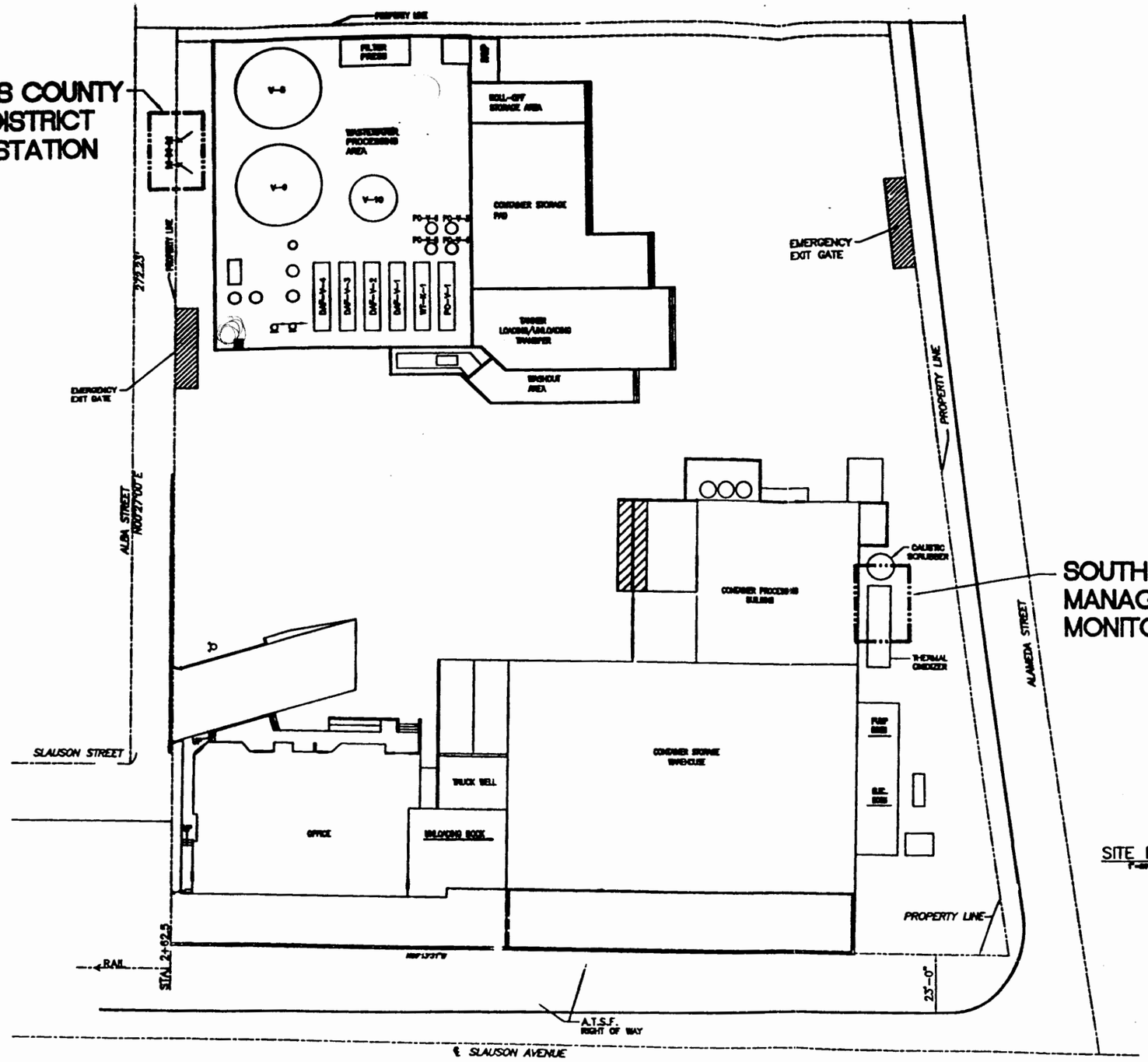
Jose Aguilar is no longer employeed by Rollins OPC, however, for your information we have enclosed his training record for your review.

As a corrective measure the company has revised its training record keeping and tracking systems. Attached for your review is a copy of the new training matrix for all Rollins OPC Employees. Also attached are the job descriptions and training requirements, including specific on the job training, for the field personnel.

ATTACHMENT 7

FACILITY MAP

LOS ANGELES COUNTY
SANITATION DISTRICT
MONITORING STATION



SOUTH COAST AIR QUALITY
MANAGEMENT DISTRICT
MONITORING STATION

SITE PLAN
1"=20'-0"

DATE	DESCRIPTION	BY
1/29/94	RCRA PART B SUBMITTAL	

REVISIONS

ROLLINS ORC INC.

ENGINEER	
DESIGNER	
CAD OPERATOR	
CHECKER	
PROJECT MANAGER	

1995 RCRA PART B
PERMIT RENEWAL DRAWINGS
5756 ALBA ST. LOS ANGELES CA.
ENVIRONMENTAL MONITORING STATIONS/EQUIP

SCALE 1"=20'-0"
PROJECT NUMBER
DRAWING NUMBER P002-CC-115

ATTACHMENT 8

BATCH SHEET - LIST OF BATCHED DRUMS (IDENTIFIED BY ROLLINS UNIQUE NUMBER)

CHEMPAK DRUM INVENTORY SHEET

CUSTOMER SITE: Non-Radioactive Non-Dioxin Non-Explosive Page of

Stream # R - 8533 - E

Drum # ROPC - Hg SWITCHES #010-26-01 THRU 34

Date: 9/26/94

WASTE TYPE:
- ☐ Appendix IV/V LP
- ☐ Non-Appendix LP
- ☐ Aerosols
- ☑ Bulk/Specification

☐ PIH Haz. Zone:

PIH Description:

☑ Packing Group: III

Chemist/Technician: JS

OSHA Carcinogen: ☐ YES ☑ NO

INFECTIOUS/MEDICAL WASTE: ☐ YES ☑ NO

ASBESTOS: ☐ YES ☑ NO

DRUM TYPE:
- ☐ 1A1- ☐ 1G- ☐ 1H1-
- ☑ 1A2- 55 ☐ 4G- ☐ 1H2-
- OTHER:

- ☐ Div. 2.1 ☐ Div. 2.2 ☐ Div. 2.3
- ☐ Class 3 ☐ Div. 4.1 ☐ Div. 4.2
- ☐ Div. 4.3 ☐ Div. 5.1 ☐ Div. 5.2
- ☐ Div. 6.1 ☐ Div. 6.2 ☐ Class 8
- ☑ Class 9 ☐ Non-Dot/Non-Reg

- ☐ Lab Pack ☐ Bulk ☐ Reactive
- ☐ Kiln ☐ Blend ☐ DA
- ☐ T-OX ☐ S&E ☐ LF
- ☐ Repack ☐ PCB ☐ Aerosol
- ☐ 3rd Party - LOCATION: BETHLEHEM

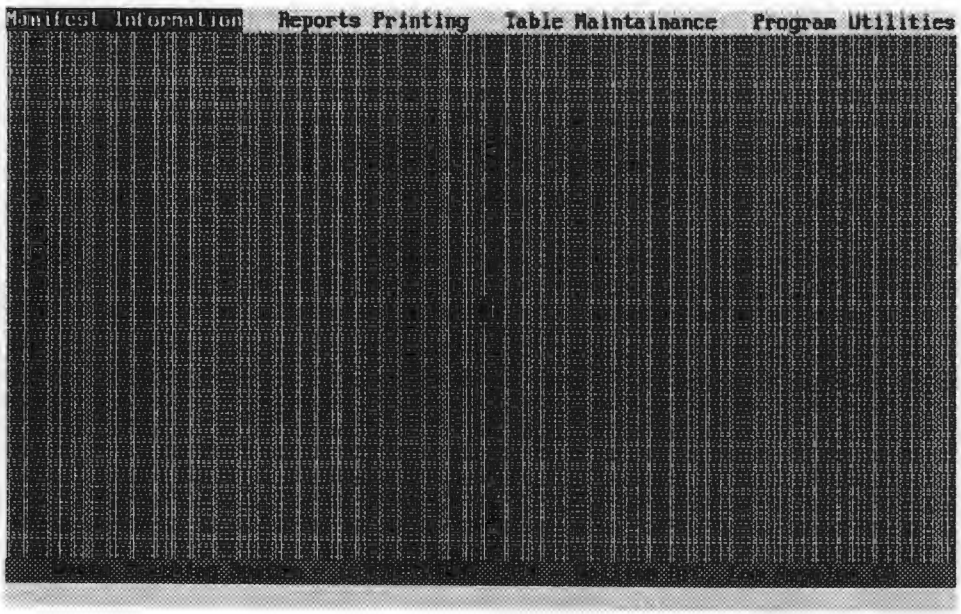
☐ RQ

DOT SHIPPING DESCRIPTION OR GENERIC SHIPPING NAME

WASTE DESCRIPTION	CONT. TYPE	WEIGHT/VOLUME	RCRA WASTE CODES	STATE CODE	TREATMENT STD. INCIN.	TREATMENT STD. OTHER	COMMENTS
MERCURY SWITCHES US WEST		9P-19666	CA92872624	OR# 95307, 95308, 95305			
				95306, 95302, 95801			
				95304, 95303, 95314			
				95341, 95316, 95313			
				95309	95310,	95312	
34 DRUMS				95311	95318	95315	
				95320	95317	95319	
				95322	95321	95325	
				95326	95323	95329	
				95328	95327	95339	
				95327	95330	95334	
TOTAL WEIGHT ☐ NET ☑ GROSS 17,000 lbs		9P-19105	-	95331 94753, 94662 APPLY	BARCODE		HERE

TREATMENT STANDARDS: If Appendix IV/V Lab Pack check INCIN, other — add specific technology or CCWE, CCW

Rollins OPC - Waste Tracking System (WTS)



Basic Menu

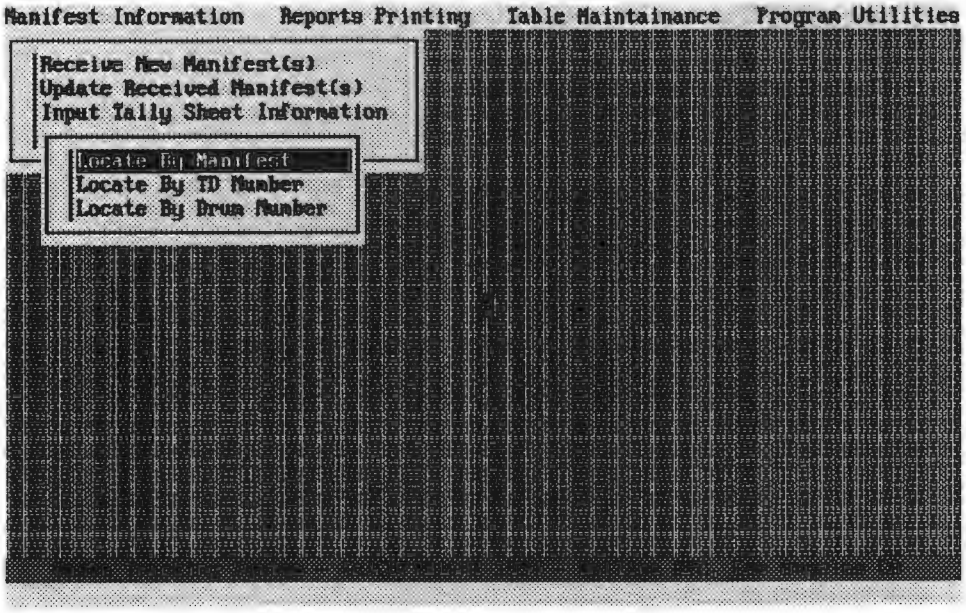
4 Choices

(#1) Manifest Receiving, Tally Sheet Entry, Manifest Update
Tally Printing

(#2) Report Printing - Daily Acceptance, Monthly Acceptance
Drum Report, Monthend Inventory and
Certificate of Disposal Generators

(#3) Table Maintenance - DOT shipping Descriptions, Generator Information
Transporter Information, State waste Codes, Elk-Waste Code
Destination Information

(#4) Program Utilities — Administrative Functions

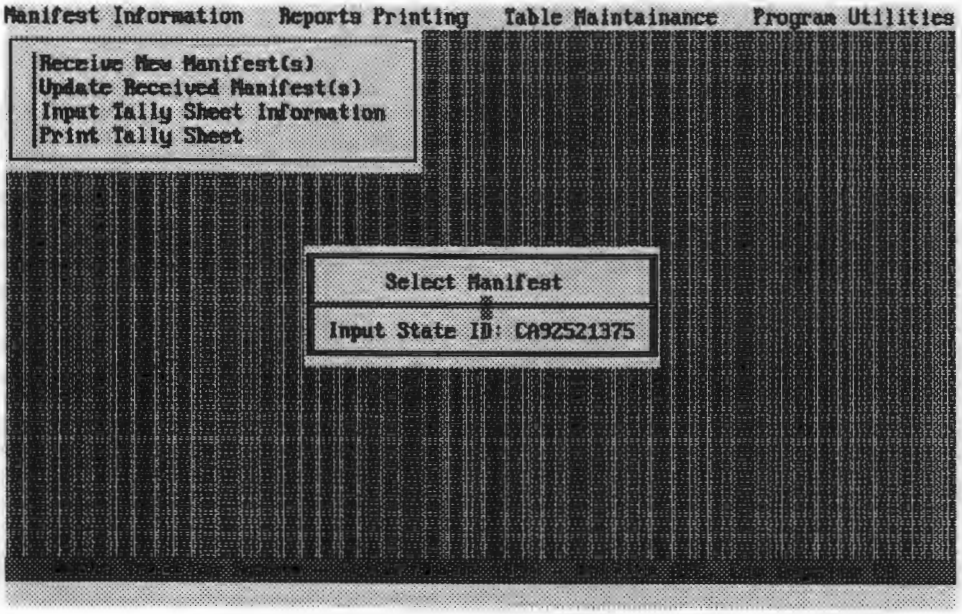


Can locate information on incoming shipments by three methods —

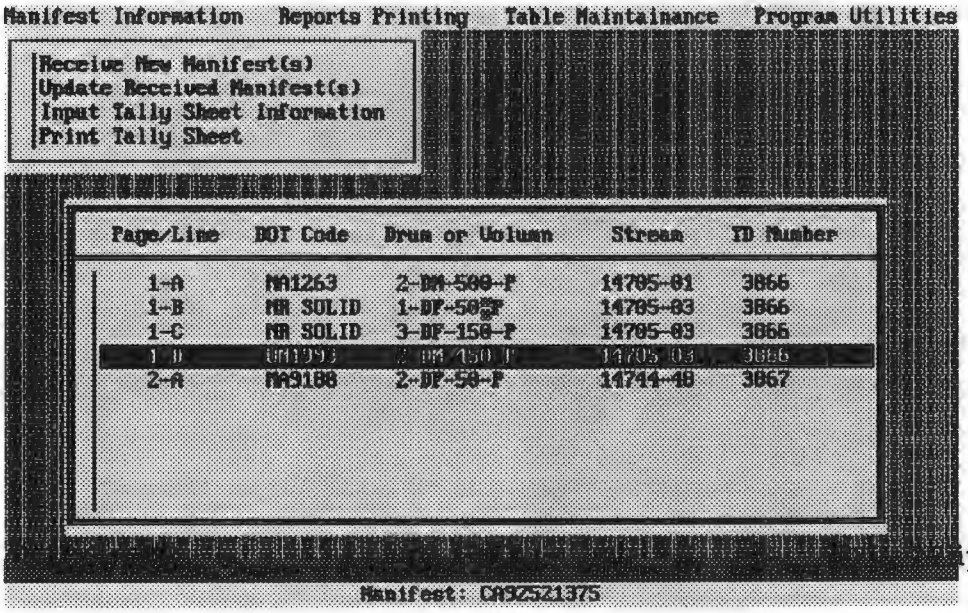
(#1) By Incoming Manifest #

(#2) By Tally Sheet #

(#3) By ORC Unique ID # (Barcode #)

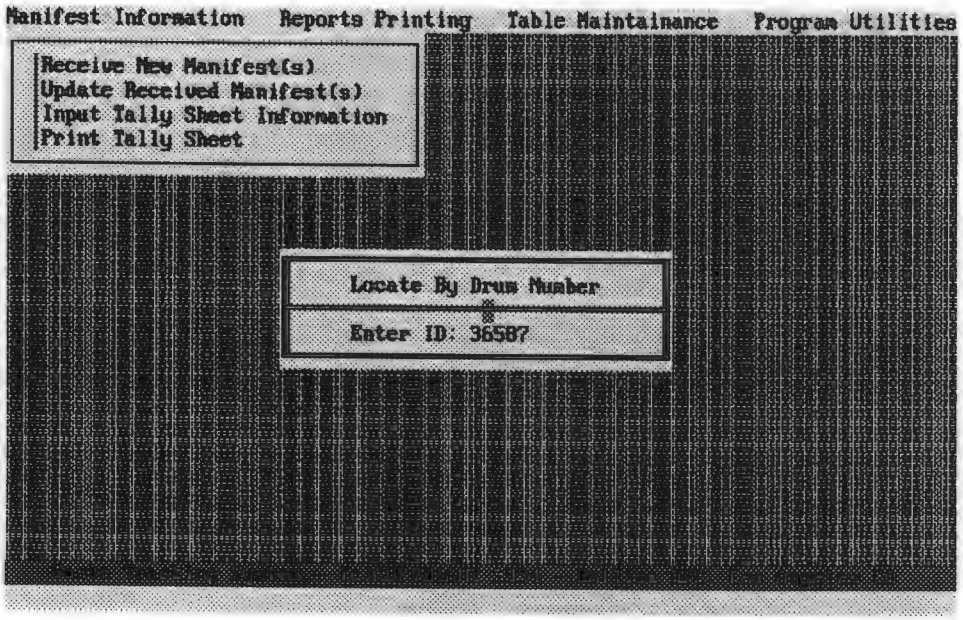


Locate by Manifest #

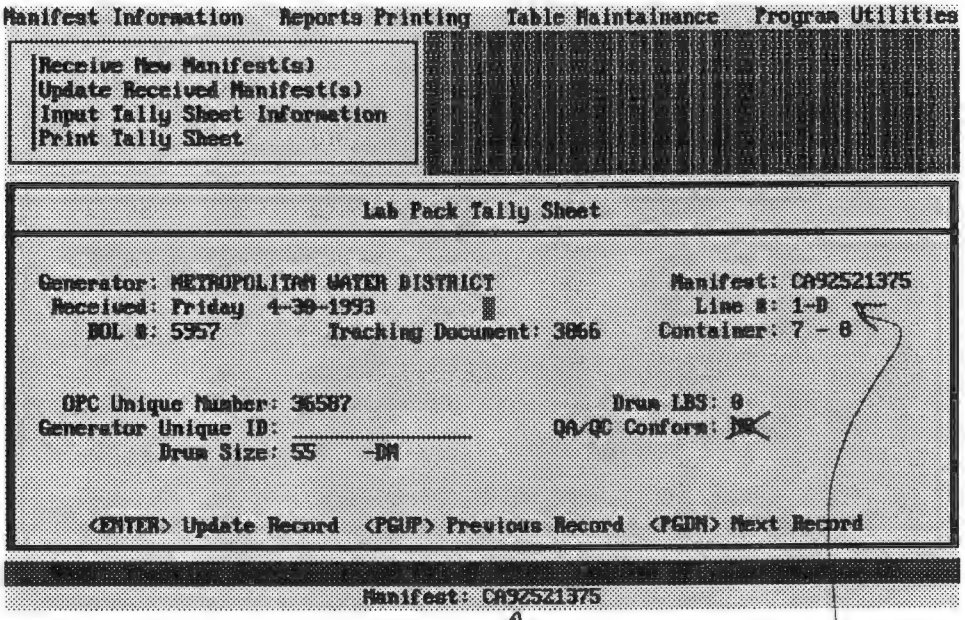


5 line items on this manifest #

Line #d has the drum requested. Displays the line item information (same as manifest)



Locate by one Unique ID# (Barcode #)



Information corresponding to this drum # 36587
on this manifest # and line item

ATTACHMENT 9

WASTEWATER TREATMENT SYSTEM FLOW DIAGRAM

BREATHER VALVE
PRESSURE CONTROL TO APC SYSTEM
N2 PRESSURE CONTROLLER
1/2"
1"
3"
V-10
OILY WATER / SLOP (FUELS)
V-8
TREATED WATER
V-9
UNCLARIFIED WATER
WG-V-5
CARBON BED (STAND BY)
PURGE AIR
FLAME ARRESTOR
TIC
WG-H-1
FUME INCINERATOR
14"
WG-P-2
CITY GAS SUPPLY
WG-P-1
PI
BREATHER VALVE
PRESSURE CONTROL TO APC SYSTEM
4"
N2 PRESSURE CONTROLLER
V-4
TREATED WATER / FILTRATE
V-6
(TOX)
V-5
EFFLUENT CHECK TANK
1" N2 GAS SUPPLY
BREATHER VALVE
V-3
SLUDGE / FILTER PRESS FEED TANK
V-2
CAUSTIC NEUTRALIZATION CYANIDE OXIDATION
V-1
ACID NEUTRALIZATION CHROME REDUCTION
WG-P-3
AIR SAMPLING POINT
6"
2"
WG-V-4
CARBON BED
PH
WG-V-2
CIRC. TANK
LIC
WG-V-1
CAUSTIC SCRUBBER
FI
7"
WG-P-5A & B
NaOH SOLUTION CIRCULATION PUMP
FILTER PRESS AREA
WG-P-4
VAPORIZER
NITROGEN STORAGE TANK
TRUCK WASHOUT AREA
WASHOUT BASIN
SECONDARY CONTAINMENT
TRUCK
AIR SAMPLING POINT
FRESH NaOH SOL.
MAKE-UP WATER

Current as of
6/10/93

NUMBER	REFERENCE DRAWINGS

NOTES:

REV	DATE	ISSUE	BY	CHECKED	APPROVED

DRAWN BTK
CHECKED
APPROVED
CLIENT APPROVAL
BY DATE
SCALE NONE

E & L ENGINEERING INC.
Engineers and Constructors Long Beach, California
A Subsidiary of EBASCO SERVICES INCORPORATED

OIL PROCESS CO.
WASTE WATER TREATMENT UNIT
APC SYSTEM P & I D

JOB NO E-0890
DWG NO OPC-P-2
REV A

ATTACHMENT 10

WASTEWATER DISCHARGE LEDGER AND DISCHARGE REPORT

item (14)

DISCH BY.	DATE DISCH.	TIME DISCH.	EFFLUENT TANK NO.	METER READING (FACTOR 1,000) BEFORE	METER READING (FACTOR 1,000) AFTER	DISCH. (GALLONS)	LAB SAMPLE NO.	DISCH BY.
JESUS	5-2-94	1150 HRS	V-5	2854.777	2862.920	8,143	4,9912	CERSO
JESUS	5-3-94	1830 HRS	V-5	2862.920	2871.120	8,200	5-9919	CERSO
JESUS	5-6-94	1600 HRS	V-5	2871.120	2879.461	8341	5-9926	CERSO
HUMBERTO	9-26-94	CALLED SANITATION DISTRICT FOR SEWER DISCHARGE ON 9-29-94						
CERSO								
JESUS/CERSO	9-30-94	11:20 AM	V-5	2879.461	2888.098	8,637	9-10241	JESUS
JESUS	10-4-94	16:30 PM	V-5	2888.098	2895.614	7516	10-10271	JESUS
CERSO								
CERSO								
CERSO								
CERSO								
CERSO								
CERSO								
CERSO								
CERSO								

ROLLINS
ENVIRONMENTAL SERVICES

November 15, 1994

Steve Overton,Chief SIU
City of Los Angeles
Bureau of Sanitation
4590 Colorado Blvd.
Los Angeles, CA 90039
Attn: Self Monitoring Section

Re: Self Monitoring Report For October, 1994.

Dear Mr. Overton:

Enclosed you will find the summary of our off-site disposal for the month of October 1994. We discharged 7,516 gallons of treated effluent into the City system for the month.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Should you or your staff have any questions, please contact me at 213-585-5063.

Sincerely,

Willy I. Ndubuizu, P.E.
Environmental Affairs Manager

WN/a
wcity.1

ROLLINS
ENVIRONMENTAL SERVICES

November 21, 1994

Department of Toxic Substance Control (DTSC)
P.O. Box 3000
Sacramento, CA 95812

RE: MONTHLY MANIFEST RECEIPT REPORT FOR OCTOBER, 1994.
EPA I.D.# CAD050806850

Dear Sirs:

Enclosed are the DTSC copies of Hazardous Waste Manifests for waste accepted by Rollins OPC Inc. (EPA I.D. # CAD050806850) for the month of October, 1994. Listed below is a summary of these loads.

Summary:

416 **Manifests Accepted**

034 **Bulk Liquid Loads**
380 **Drum Loads**
002 **Bulk Solid Loads**
416 **Total Loads**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you note any discrepancies or have any questions regarding the information enclosed, please call me at (213) 585-5063.

Sincerely,

William J. Mitzel
President

Enclosures

cc: Nancy Carder - CAL-EPA (Region 3)

ROLLINS OPC INC.
5756 Alba Street • Los Angeles, California 90058 • FAX: (213) 585-9214 • Phone: (213) 585-5063

SHIPPING ACTIVITY
MONTH OF
October 1994

DATE SHIPPED	DISPOSAL FACILITY	STATE MANIFEST #	P.O. #	TYPE OF MATERIAL	STREAM NUMBER	QUANTITY SHIPPED	CARRIER	MODE OF TRANSPORT
10-03-94	ENVIROSAFE of IDAHO	95101352	1287	FILTER CAKE &CRUSHED DRUMS	13859001 13859002	18 YARDS 40 YARDS	SECURITY ENVIRONMENTAL	BIN#: 123/405
10-03-94	RES(TEXAS)	00627295	1286	BLEND	HO-57409-30	36, 950 POUNDS	MATLACK	SECS 395438
10-04-94	RES(LOUISIANA)	6207128	1288	T-OX	BR-33229	41, 950 POUNDS	MATLACK	SECS 591156
10-04-94	RES(TEXAS)	00629193	1281	• PAINT SLUDGE • TRASH & DEBRIS CONTAMINATED WITH SOLVENT	HO-50053-20 HO-48345-20	23, 975 POUNDS 3, 150 POUNDS **27, 125 POUNDS**	MATLACK	VAN: 6352
10-04-94	RES(LOUISIANA)	6207081	1282	• LAB PACK • CYANIDES • TRASH & DEBRIS CONTAMINATED WITH SOLVENT • ACID CONTAMINATED DEBRIS	BR-33342 BR-35925 BR-37519 BR-44657	6, 314 POUNDS 175 POUNDS 2, 450 POUNDS 3, 675 POUNDS **12, 614 POUNDS**	MATLACK	VAN: 6352
10-04-94	RES(LOUISIANA)	6207066	1282	LAB PACK	BR-33342	44 POUNDS	MATLACK	VAN: 6352
10-04-94	RES(LOUISIANA)	6207038	1282	LAB PACK	BR-33342	245 POUNDS	MATLACK	VAN: 6352
10-04-94	RES(LOUISIANA)	6207080	1282	POISONOUS SOLIDS	BR-47747	1, 750 POUNDS	MATLACK	VAN: 6352
10-05-94	RES(TEXAS)	00627327	1285	FUEL	HO-42944-16	39, 180 POUNDS	MATLACK	UTCU 934087
10-05-94	RES(LOUISIANA)	6207016	1292	T-OX	BR-33229	39, 260 POUNDS	MATLACK	SNIU 125194
10-06-94	RES(TEXAS)	00627328	1293	BLEND	HO-57409-30	38, 970 POUNDS	MATLACK	SNIU 123229
10-06-94	RES(LOUISIANA)	6207018	1294	BLEND	BR-33095	40, 380 POUNDS	MATLACK	SNIU 123226

SHIPPING ACTIVITY
MONTH OF
October 1994

DATE SHIPPED	DISPOSAL FACILITY	STATE MANIFEST #	P.O. #	TYPE OF MATERIAL	STREAM NUMBER	QUANTITY SHIPPED	CARRIER	MODE OF TRANSPORT
10-06-94	ENVIROSAFE of IDAHO	95101350	1296	FILTER CAKE & CRUSHED DRUMS	13859001 13859002	18 YARDS 40 YARDS	SECURITY ENVIRONMENTAL	BIN# 125/169
10-06-94	RES(TEXAS)	00627321	1289	• PAINT SLUDGE • TRASH & DEBRIS CONTAMINATED WITH SOLVENT • BROKEN GLASS CONTAINERS	HO-50053-20 HO-48345-20 HO-70600-13	19, 425 POUNDS 12, 775 POUNDS 800 POUNDS **33, 000 POUNDS**	MATLACK	VAN# 3509
10-07-94	RES(TEXAS)	00627329	1297	BLEND	HO-57409-30	38, 060 POUNDS	MATLACK	SECS 591165
10-07-94	RES(LOUISIANA)	6207083	1299	FUEL	BR-33095	39, 650 POUNDS	MATLACK	TANKER # SP-6446
10-07-94	RES(TEXAS)	00617628	1300	BLEND	HO-57409-30	42, 270 POUNDS	MATLACK	TANKER # SP-1191
10-10-94	RES(TEXAS)	00627330	1301	T-OX	HO-24294-33	36, 930 POUNDS	MATLACK	SNIU 123180
10-10-94	ENVIROSAFE of IDAHO	95101354	1302	• ASBESTOS • CRUSHED DRUMS	13859003 13889002	40 YARDS 40 YARDS **80 YARDS**	SECURITY ENVIRONMENTAL	BIN# 520/402
10-11-94	RES(TEXAS)	00629192	1291	• PAINT SLUDGE • TRASH & DEBRIS CONTAMINATED WITH SOLVENT	HO-50053-20 HO-48345-20	25, 200 POUNDS 5, 425 POUNDS **30, 625 POUNDS**	MATLACK	VAN: 2523
10-11-94	RES(TEXAS)	00617716	1291	PCBs	HO-54782-14 HO-54783-48 HO-54787-40	474 KILOs 60 KILOs 3, 930 KILOs **4, 464 KILOs**	MATLACK	VAN: 2523
10-11-94	RES(TEXAS)	00627331	1304	FUEL	HO-42944-16	30, 810 POUNDS	MATLACK	SECS 591157
10-12-94	RES(TEXAS)	00629191	1298	• PAINT SLUDGE • TRASH & DEBRIS CONTAMINATED WITH SOLVENT • RESIN DEBRIS	HO-50053-20 HO-48345-20 HO-78057-13	16, 450 POUNDS 18, 900 POUNDS 700 POUNDS **36, 050 POUNDS**	MATLACK	VAN: 893161

SHIPPING ACTIVITY
MONTH OF
October 1994

DATE SHIPPED	DISPOSAL FACILITY	STATE MANIFEST #	P.O. #	TYPE OF MATERIAL	STREAM NUMBER	QUANTITY SHIPPED	CARRIER	MODE OF TRANSPORT
10-12-94	RES(LOUISIANA)	6207074	1305	FUEL	BR-33095	39, 130 POUNDS	MATLACK	TANKER # SP-9460
10-12-94	HIGHWAY 36	95101355	1306	FILTER CAKE & CRUSHED DRUMS	10202 10203	18 YARDS 40 YARDS	SECURITY ENVIRONMENTAL	BIN#: 407/138
10-12-94	RES(TEXAS)	00617639	1310	BLEND	HO-57409-30	38, 770 POUNDS	MATLACK	SNIU 123106
10-12-94	RES(LOUISIANA)	3304601 3304602 3304603	1309	LABPACKs	33342	72 POUNDS 58 POUNDS 217 POUNDS **347 POUNDS**	C.E.T.	BOBTAIL
10-13-94	RES(TEXAS)	00627332	1307	T-OX	HO-24294-33	33, 360 POUNDS	MATLACK	SECS 591174
10-13-94	RES(TEXAS)	00617717	1308	OCTANE BOTTOMS	HO-57656-20	15, 400 POUNDS	MATLACK	VAN 6361
10-13-94	ENVIROSAFE of IDAHO	95101351	1311	FILTER CAKE & CRUSHED DRUMS	13859001 13859002	18 YARDS 40 YARDS	SECURITY ENVIRONMENTAL	BIN: 127/402
10-14-94	RES(TEXAS)	00629222	1295	• PAINT SLUDGE • TRASH & DEBRIS CONTAMINATED WITH SOLVENT • DEBRIS W/RESIN • BROKEN GLASS CONTAINERS	HO-50053-20 HO-48345-20 HO-78057-13 HO-70600-13	14, 875 POUNDS 16, 625 POUNDS 1, 600 POUNDS 400 POUNDS **33, 500 POUNDS**	KVS	VAN: 6368
10-14-94	RES(TEXAS)	00629208	1303	• PAINT SLUDGE • TRASH & DEBRIS CONTAMINATED WITH SOLVENT • DEBRIS W/RESIN • POISONOUS SOLIDS	HO-50053-20 HO-48345-20 HO-78057-13 HO-57646-20	9, 625 POUNDS 10, 325 POUNDS 1, 000 POUNDS 7, 000 POUNDS **27, 950 POUNDS**	MATLACK	VAN: 2542
10-17-94	RES(TEXAS)	00627318	1309	• PAINT SLUDGE • TRASH & DEBRIS CONTAMINATED WITH SOLVENT • POISONOUS SOLIDS	HO-50053-20 HO-48345-20 HO-57646-20	15, 225 POUNDS 7, 700 POUNDS 7, 000 POUNDS **29, 925 POUNDS**	MATLACK	VAN: 700349

SHIPPING ACTIVITY
MONTH OF
October 1994

DATE SHIPPED	DISPOSAL FACILITY	STATE MANIFEST #	P.O. #	TYPE OF MATERIAL	STREAM NUMBER	QUANTITY SHIPPED	CARRIER	MODE OF TRANSPORT
10-17-94	RES(LOUISIANA)	6207077	1316	FUEL	BR-33095	39, 710 POUNDS	MATLACK	TANKER # SP-8418
10-17-94	RES(LOUISIANA)	6207022	1315	FUEL	BR-33095	40, 760 POUNDS	MATLACK	TANKER # SP-8667
10-17-94	RES(LOUISIANA)	6207011	1314	BLEND	BR-33095	46, 480 POUNDS	MATLACK	TANKER # SP-9587
10-17-94	RES(TEXAS)	00617640	1312	T-OX	HO-24294-33	46, 450 POUNDS	MATLACK	UTCU 454240
10-18-94	RES(TEXAS)	00617630	1313	T-OX	HO-24294-33	43, 490 POUNDS	MATLACK	TANKER # SP-9468
10-18-94	RES(TEXAS)	00627319	1320	• PAINT SLUDGE • TRASH & DEBRIS CONTAMINATED WITH SOLVENT • RESIN DEBRIS • BROKEN GLASS CONTAINERS • LAB PACK	HO-50053-20 HO-48345-20 HO-78057-13 HO-70600-13 HO-43271-60	24, 675 POUNDS 17, 150 POUNDS 900 POUNDS 400 POUNDS 92 POUNDS 43, 217 POUNDS	MATLACK	VAN:2537
10-18-94	HIGHWAY 36	95101356	1319	FILTER CAKE & CRUSHED DRUMS	10202 10203	18 YARDS 40 YARDS 58 YARDS	SECURITY ENVIRONMENTAL	BIN#: 101/1002
10-19-94	RES(TEXAS)	00617603	1323	FUEL	HO-42944-16	33, 270 POUNDS	MATLACK	SECS 541276
10-19-94	RES(TEXAS)	00627334	1321	BLEND	HO-57409-30	45, 160 POUNDS	MATLACK	TANKER # SP-2366
10-20-94	CHEMICAL WASTE MANAGEMENT	95101361	1328	NON-RCRA SOLIDS (TRASH & DEBRIS)	BM-5957	40 YARDS	MATLACK	BIN#: 433
10-20-94	RES(LOUISIANA)	6207021	1327	BLEND	BR-33095	42, 530 POUNDS	MATLACK	TANKER # WR-8531
10-20-94	RES(LOUISIANA)	6207126	1326	BLEND	BR-33095	39, 090 POUNDS	MATLACK	BONO 924173
10-20-94	RES(LOUISIANA)	6207082	1325	BLEND	BR-33095	38, 510 POUNDS	MATLACK	TRLU 024005

SHIPPING ACTIVITY
MONTH OF
October 1994

DATE SHIPPED	DISPOSAL FACILITY	STATE MANIFEST #	P.O. #	TYPE OF MATERIAL	STREAM NUMBER	QUANTITY SHIPPED	CARRIER	MODE OF TRANSPORT
10-20-94	RES(TEXAS)	00617718	1317	• PAINT SLUDGE • POISONOUS SOLIDS • SPENT ACTIVATED CARBON	HO-50053-20 HO-57646-20 HO-61734-20	175 POUNDS 11, 375 POUNDS 4, 200 POUNDS **15, 750 POUNDS**	MATLACK	VAN #: 273171
10-21-94	RES(TEXAS)	00617704	1330	FUEL	HO-42944-16	37, 060 POUNDS	MATLACK	SNIU 123158
10-21-94	HIGHWAY 36	95101363	1333	CRUSHED DRUMS	10203	80 YARDS	SECURITY ENVIRONMENTAL	BIN#: 401/405
10-21-94	MERCURY REFINING CO. *VIA* LAMBRIGHT(TX)	NYB429897 NYB429898	1322	MERCURY WASTES	ROL-01-93 ROL-04-93 ROL-05-93 ROL-09-93 ROL-10-93 ROL-12-93	5, 100 POUNDS 750 POUNDS 1, 500 POUNDS 3, 500 POUNDS 140 POUNDS 1, 097 POUNDS **12, 087 POUNDS**	C.E.T.	VAN: 6085
10-21-94	BETHLEHEM APPARATUS *VIA* LAMBRIGHT(TX)	PAC7590741	1332	MERCURY WASTES	ELEMENTAL 8533-E 8533-G	4, 000 POUNDS 5, 700 POUNDS 300 POUNDS **10, 000 POUNDS**	C.E.T.	VAN: 6085
10-21-94	RES(LOUISIANA) *VIA* LAMBRIGHT(TX)	LAA6207014 LAA6207015	1324	• CORROSIVE SOLIDS • PLATING BATH SOLIDS • POISONOUS SOLIDS • LITHIUM BATTERIES • LAB PACK	BR-44657 BR-35925 BR-38947 BR-39722 BR-33342	5, 075 POUNDS 1, 400 POUNDS 875 POUNDS 320 POUNDS 220 POUNDS **7, 890 POUNDS**	C.E.T.	VAN: 6085
10-24-94	RES(TEXAS)	00627320	1318	• PAINT SLUDGE • TRASH & DEBRIS CONTAMINATED WITH SOLVENT • SPENT ACTIVATED CARBON • RESIN CONTAMINATED DEBRIS • CRUSHED GLASS	HO-50053-20 HO-48345-20 HO-61734-20 HO-78057-13 HO-70600-13	18, 900 POUNDS 8, 925 POUNDS 7, 000 POUNDS 4, 375 POUNDS 1, 200 POUNDS	MATLACK	VAN:6371

SHIPPING ACTIVITY
MONTH OF
October 1994

DATE SHIPPED	DISPOSAL FACILITY	STATE MANIFEST #	P.O. #	TYPE OF MATERIAL	STREAM NUMBER	QUANTITY SHIPPED	CARRIER	MODE OF TRANSPORT
10-24-94	RES(LOUISIANA)	LAA6207013	1331	FUEL	BR-33095	41, 500 POUNDS	MATLACK	TANKER # SP-1553
10-25-94	RES(TEXAS)	00617708	1335	FUEL	HO-42944-16	30, 790 POUNDS	MATLACK	SECS 991774
10-25-94	RES(TEXAS)	00617719	1329	FUEL	HO-42944-16	44, 530 POUNDS	MATLACK	TANKER # SP-2348
10-25-94	RES(TEXAS)	00617721	1337	• PAINT SLUDGE • TRASH & DEBRIS CONTAMINATED WITH SOLVENT • RESIN CONTAMINATED DEBRIS.	HO-50053-20 HO-48345-20 HO-78057-13	36, 225 POUNDS 9, 800 POUNDS 700 POUNDS **46, 725 POUNDS**	MATLACK	VAN 6334
10-25-94	ENVIROSAFE of IDAHO	95101353	1336	FILTER CAKE & CRUSHED DRUMS	13859001 13859002	18 YARDS 40 YARDS **58 YARDS**	SECURITY ENVIRONMENTAL	BIN#: 112/403
10-26-94	RES(TEXAS)	00617722	1334	• PAINT SLUDGE • TRASH & DEBRIS CONTAMINATED WITH SOLVENT • SPENT ACTIVATED CARBON • RESIN DEBRIS	HO-50053-20 HO-48345-20 HO-61734-20 HO-78057-13	29, 700 POUNDS 6, 825 POUNDS 525 POUNDS 1050 POUNDS **38, 100 POUNDS**	MATLACK	VAN: 2534
10-26-94	RES(TEXAS)	00617703	1338	FUEL	HO-42944-16	42, 480 POUNDS	MATLACK	TANKER # SP-1052
10-26-94	RES(TEXAS)	00617710	1339	BLEND	HO-57409-30	37, 040 POUNDS	MATLACK	SNIU 123228
10-27-94	MERCURY RECOVERY SERVICES	95100500	1345	FLUORESCENT LIGHT BULBS	N/A	4, 150 POUNDS	MATLACK	VAN: 9692
10-28-94	RES(TEXAS)	00617643	1341	T-OX	HO-24294-33	41, 320 POUNDS	MATLACK	TANKER # SP-8255
10-28-94	RES(TEXAS)	00617709	1344	BLEND	HO-57409-30	40, 370 POUNDS	MATLACK	SNIU 123225

SHIPPING ACTIVITY
MONTH OF
October 1994

DATE SHIPPED	DISPOSAL FACILITY	STATE MANIFEST #	P.O. #	TYPE OF MATERIAL	STREAM NUMBER	QUANTITY SHIPPED	CARRIER	MODE OF TRANSPORT
10-28-94	RES(TEXAS)	00617618	1342	FUEL	HO-42944-16	30, 280 POUNDS	MATLACK	SECS 395438
10-28-94	RES(TEXAS)	00617651	1343	T-OX	HO-24294-33	37, 190 POUNDS	MATLACK	SNIU 123124
10-28-94	HIGHWAY 36	95101357	1346	FILTER CAKE	10202	18 YARDS	SECURITY ENVIRONMENTAL	BIN#: 134
10-31-94	RES(TEXAS)	00617732	1348	BLEND	HO-57409-30	44, 470 POUNDS	MATLACK	TANKER # SP-8155
10-31-94	HIGHWAY 36	95101358	1349	CRUSHED DRUMS	10203	40 YARDS	SECURITY ENVIRONMENTAL	BIN#: 407
10-31-94	CHEMICAL WASTE MANAGEMENT	95100501	1348	CALCIUM FORMATE	BM 6196	44, 000 POUNDS	MATLACK	VAN: 9694

ATTACHMENT 12

COVER LETTER FOR SEPTEMBER MONTHLY MANIFEST RECEIPT REPORT

ROLLINS
ENVIRONMENTAL SERVICES

October 20, 1994

Department of Toxic Substance Control (DTSC)
P.O. Box 3000
Sacramento, CA 95812

RE: MONTHLY MANIFEST RECEIPT REPORT FOR AUGUST, 1993.
EPA I.D.# CAD050806850

Dear Sirs:

Enclosed are the DTSC copies of Hazardous Waste Manifests for waste accepted by Rollins OPC Inc. (EPA I.D. # CAD050806850) for the month of September, 1994. Listed below is a summary of these loads. One load were rejected.

Summary:

562 **Manifests Accepted**

046 **Bulk Liquid Loads**
507 **Drum Loads**
009 **Bulk Solid Loads**
562 **Total Loads**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you note any discrepancies or have any questions regarding the information enclosed, please call me at (213) 585-5063.

Sincerely,

William J. Mitzel
President

Enclosures

cc: Nancy Carder - CAL-EPA (Region 3)

ROLLINS OPC INC.
5756 Alba Street • Los Angeles, California 90058 • FAX: (213) 585-9214 • Phone: (213) 585-5063

ATTACHMENT 13

MANIFEST NO. LA A 3304611, AND INCOMPLETE LDR NOTIFICATION